

<p>Attorney or Party Name, Address, Telephone & FAX Numbers, State Bar Number & Email Address AARON E. DE LEEST (State Bar No. 132426) adeleest@DanningGill.com SHANTAL MALMED (State Bar No. 351496) smalmed@DanningGill.com DANNING, GILL, ISRAEL & KRASNOFF, LLP 1901 Avenue of the Stars, Suite 450 Los Angeles, California 90067-6006 Telephone (310) 277-0077 Facsimile (310) 277-5735</p> <p><input type="checkbox"/> Plaintiff(s) appearing without attorney <input checked="" type="checkbox"/> Attorney for Plaintiff(s)</p>	<p>FOR COURT USE ONLY</p>
<p align="center">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</p>	
<p>In re: JAMIE LYNN GALLIAN,</p> <p align="right">Debtor(s).</p>	<p>CASE NUMBER: 8:21-bk-11710-SC ADVERSARY NUMBER: 8:23-ap-01064-SC CHAPTER: 7</p>
<p>JEFFREY I. GOLDEN, Chapter 7 Trustee,</p> <p align="right">Plaintiff(s),</p> <p align="center">vs.</p> <p>J-SANDCASTLE CO., LLC; J-PAD LLC; STEVEN D. GALLIAN; BRIAN J. GALLIAN; JUSTIN BARCLAY; RONALD J. PIERPONT; ROBERT J. MCLELLAND; AND E.J. GALLIAN</p> <p align="right">Defendant(s).</p>	<p align="center">PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1</p> <p>DATE: 05/07/2024 TIME: 1:30 pm COURTROOM: 5C ADDRESS: 411 W. Fourth Street Santa Ana, California 92701</p>

TO THE DEFENDANT, DEFENDANT'S ATTORNEY AND OTHER INTERESTED PARTIES:

1. Name of Defendant(s) against whom default judgment is sought (*specify name*): J-PAD LLC
2. Plaintiff filed the complaint in the above-captioned proceeding on (*specify date*): 06/30/2023
3. The Summons and Complaint were served on Defendant by ☐ personal service ☒ mail service on the following date (*specify date*): 07/06/2023
4. A true and correct copy of the completed return of summons form is attached.

"Bankruptcy Code" and "11 U.S.C." refer to the United States Bankruptcy Code, Title 11 of the United States Code.
"FRBP" refers to the Federal Rules of Bankruptcy Procedure. "LBR" and "LBRs" refer to the Local Bankruptcy Rule(s) of this court.

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

5. The time for filing an answer or other response expired on (*specify date*): 08/02/2023
6. No answer or other response has been filed or served by Defendant.
7. The default of Defendant:
- a. ☐ Has not yet been entered, but is requested
- b. ☒ Was entered on (*specify date*): 08/22/2023
8. **A Status Conference:**
- a. ☐ Is scheduled for (*specify date, time, and place*): _____
- b. ☒ Was held on (*specify date, time, and place*): 11/26/2023 at 1:30 pm, Courtroom 5C, 411 W. Fourth Street, Santa Ana, California 92701
9. As proof that Plaintiff is entitled to the relief requested in the complaint, Plaintiff:
- a. ☒ Relies on the complaint and attached documents.
- b. ☒ Attaches the following documents to establish a *prima facie* case:
- (1) ☒ Declaration of (*specify*): Shantal Malméd
- (2) ☐ Declaration of (*specify*): _____
- (3) ☒ Other (*specify*): Request for Judicial Notice
10. As further support for entry of a default judgment, Plaintiff submits a memorandum of points and authorities (optional).
11. **DECLARATION OF NON-MILITARY STATUS** (Servicemembers Civil Relief Act, 50 U.S.C. chapter 50 (§§ 3901-4043)). The undersigned party or counsel declares under penalty of perjury, with respect to each Defendant against whom a default judgment is sought by this motion:
- a. ☒ Defendant is not currently in military service. The facts that support this statement are as follows (*see the court's website for information about how to verify non-military status*):
The Plaintiff has received no notice from the Defendant claiming that it is currently in military service and knows of no facts that support this claim.
- b. ☐ Defendant is currently in military service. The facts that support this statement are as follows (*if this box is checked, the plaintiff must attach a supplement to this motion addressing the requirements in 50 U.S.C. § 3931(b)(2) to appoint an attorney for the Defendant before entering a judgment*):
- c. ☐ I am unable to determine whether or not Defendant is in military service. The facts that support this statement are as follows (*if this box is checked, the plaintiff must attach a supplement to this motion addressing the bond requirement in 50 U.S.C. § 3931(b)(3)*):

12. Defaulting party is not an infant or incompetent party.

Plaintiff requests that this court enter a default judgment in favor of Plaintiff. A copy of the lodged proposed default judgment is attached as Exhibit A.

Date: 4/5/2024

Respectfully submitted,

Danning, Gill, Israel & Krasnoff, LLP

Printed name of law firm

/s/ Shantal Malmel

Signature

Shantal Malmel

Name of Attorney for Plaintiff or Plaintiff

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MEMORANDUM OF POINTS AND AUTHORITIES

I.

STATEMENT OF FACTS

A. Bankruptcy Background

On or about July 9, 2021 (the “Petition Date”), Jamie Lynn Gallian (the “Debtor”) commenced this case by filing a voluntary petition for relief under Chapter 7 of the Code. A copy of the Debtor’s Chapter 7 petition is attached as Exhibit 1 to the Request for Judicial Notice ¶ 3.

Jeffrey I. Golden thereafter accepted appointment as the Chapter 7 trustee for the Debtor’s bankruptcy estate and continues to serve in that capacity for the benefit of creditors.

B. Denial of Debtor’s Discharge

On October 18, 2021, Houser Bros. Co (“Houser”) filed a complaint against the Debtor and initiated *Houser Bros. Co. v. Gallian*, Adv. Proc. No. 8:21-ap-01097-SC (the “Houser Lawsuit”).¹

The Houser Lawsuit went to trial on April 26, 2023 (Houser Lawsuit, *docket no. 68*).²

On May 23, 2023, the Court entered its memorandum of decision after trial (the “Houser Memorandum Decision”) (Houser Lawsuit, *docket no. 81*).³

On July 7, 2023, the Court entered judgment denying the Debtor’s discharge pursuant to 11 U.S.C. §§ 727(a)(2)(A), (a)(4), and (a)(5) (Houser Lawsuit, *docket no. 100*).⁴

C. Adversary Proceeding and Complaint

On June 30, 2023, the Trustee initiated this adversary proceeding by filing a *Complaint: (1) to Avoid and Recover Fraudulent Transfers; (2) to Avoid and Recover Postpetition Transfers; (3) for Declaratory Relief; (4) for Breach of Contract; (5) for Money Had and Received; and (6) Unjust Enrichment* (the “Complaint”) against J-Pad LLC (the “Defendant” or “J-Pad”), J-Sandcastle Co., LLC, Ronald J. Pierpoint, Steven D. Gallian, Brian J. Gallian, Justin Barclay,

¹ Request for Judicial Notice ¶ 4.

² Request for Judicial Notice ¶ 8.

³ Request for Judicial Notice ¶ 9.

⁴ Request for Judicial Notice ¶ 12.

1 Robert J. McLelland, and E. J. Gallian (*adv. docket no. 1*). A copy of the Complaint is attached to
2 the Request for Judicial Notice as Exhibit 13.

3 The *Summons and Notice of Status Conference in Adversary Proceeding [LBR 7004-1]* (the
4 “Summons”) was served by mail on the Defendant on July 6, 2023 (*adv. docket nos. 3, 5 and 6*). A
5 copy of the Summons and proof of service thereof is attached to the Request for Judicial Notice as
6 Exhibit 14.

7 The deadline for the Defendant to file and serve a written response to the Complaint was
8 August 2, 2023. No answer or other responsive pleading has been filed or served by the Defendant.

9 On August 22, 2023, the Court entered default against the Defendant (*adv. docket nos. 29,*
10 *30, and 31*). A copy of the Notice of Entry of Default thereof is attached to the Request for Judicial
11 Notice as Exhibit 16.

12 **D. Allegations and Facts**

13 J-Pad was a California limited liability company, with its principal place of business located
14 in in the County of Orange, State of California. The Debtor is the sole member and manager of J-
15 Pad. Complaint ¶ 4.⁵

16 Up to and until about October 31, 2018, the Debtor lived at 4476 Alderport Drive, Unit 53,
17 Huntington Beach, CA 92649 (“Alderport Property”), which she received as a gift in 2017 from her
18 stepmother, Sandra Bradley (“Ms. Bradley”). The Debtor always held title to the Alderport
19 Property in her own name. Complaint ¶ 14.

20 On or about October 31, 2018, the Debtor sold the Alderport Property to Randall Nickell
21 for \$379,000, which he paid for in two cashier’s checks payable to the Debtor, individually.
22 Complaint ¶ 15.

23 The Debtor deposited the funds from Mr. Nickell for the Alderport Property into a Chase
24 Bank account in her name. Complaint ¶ 16.

25
26
27

⁵ See Trial Transcript, case no. 8:21-bk-11710, Houser Lawsuit, docket no. 72, pages 104, 135-136
28 (Debtor testified she is the member and 100% owner).

1 Thereafter, the Debtor used \$185,000 of the proceeds from the sale of the Alderport
2 Property to purchase a manufactured home located at 16222 Monterey Lane, Space #376,
3 Huntington Beach, CA 92649 (the “Property”) from Lisa Ryan. Complaint ¶ 17.⁶

4 The Debtor paid Ms. Ryan the first \$10,000 on November 1, 2018, and the \$175,000
5 balance of the purchase price for the Property on November 17, 2018. Complaint ¶ 18.

6 Even though the Debtor paid for the Property with proceeds from the sale of her Alderport
7 Property deposited into a bank account in her own name, the Debtor transferred title to, and the
8 beneficial interest in, the Property to J-Sandcastle. Complaint ¶ 19.⁷

9 At the time Debtor transferred the Property to J-Sandcastle, she was being sued in multiple
10 actions and judgments were later entered against her as follows (Complaint ¶ 20 (a)-(e)):

11 (a) On November 8, 2018, in Case No. 30-2017-00913985, the Orange County Superior
12 Court (“OCSC”) granted a motion by the Huntington Beach Gables Homeowners Association
13 (“HOA”) for attorney’s fees against the Debtor, and on December 4, 2018, the OCSC entered an
14 order on the motion, which reflected that the HOA had been awarded \$46,138 of attorney’s fees
15 against the Debtor, plus interest.⁸

16 (b) On May 6, 2019, in Case No. 30-2017-00913985, the HOA obtained judgment
17 against the Debtor in excess of \$315,000.

18 (c) On September 27, 2018, in Case No. 30-2017-00962999, the OCSC imposed \$3,070
19 of sanctions against the Debtor.

20 (d) On March 21, 2019, in Case No. 30-2017-00962999, the HOA obtained a money
21 judgment against the Debtor for \$9,265.

22 (e) To date, the Debtor has paid approximately \$1,295 on account of all these
23 judgments and orders.

24
25 ⁶ See Exhibit 12 to the Request for Judicial Notice, page 267. See also Trial Transcript, case no.
26 8:21-bk-11710, Houser Lawsuit, docket no. 72, pages 22-23.

27 ⁷ See Exhibit 12 to the Request for Judicial Notice, page 267.

28 ⁸ See Request for Judicial Notice ¶ 2.

1 **1. J-Pad Transfers**

2 At about the time that the Debtor purchased the Property, she sought to conceal the equity
3 in the Property by granting a lien for \$225,000 on the Property in favor of J-Pad. Complaint ¶ 27.⁹

4 On November 16, 2018, the Debtor, as the sole member of J-Sandcastle, executed a secured
5 promissory note in the amount of \$225,000 between J-Pad and J-Sandcastle. J-Pad was the lender
6 and J-Sandcastle was the borrower.¹⁰ The secured promissory note is secured by a separate security
7 agreement dated November 16, 2018, reflecting a security interest in the Property between J-
8 Sandcastle and J-Pad (the “First J-Pad Transfer”) (the “First J-Pad Transfer”). Complaint ¶ 28.¹¹

9 On January 14, 2019, the Debtor individually and through J-Pad filed not less than three
10 UCC-1 Financing Statements with the California Secretary of State listing J-Pad as the secured
11 party and the collateral as the Property (collectively, the “Fourth J-Pad Transfer”). A UCC filing
12 failed to perfect liens against the Property. Complaint ¶ 32.¹²

13 Thereafter, on August 20, 2020, the Debtor signed a “Statement to Encumber” that was
14 submitted to the HCD to add the Debtor’s ex-husband, Ronald J. Pierpont, and J-Pad as lienholders
15 on the certificate of title for the Property (the “Fifth J-Pad Transfer”). Complaint ¶ 33.¹³

16
17
18 ⁹ See Exhibit 12 to the Request for Judicial Notice, page 268.

19 ¹⁰ See Exhibit 12 to the Declaration of Shantal Malmed, page 268.

20 ¹¹ See Exhibit 12 to the Request for Judicial Notice, page 268. In addition, in the Houser
21 Memorandum Decision, the Court found that “in late 2018, [the Debtor] also executed a
22 promissory note and security agreement on the mobile home by and between two entities that she
23 managed, J-Sandcastle and J-Pad, LLC. (“J-Pad”). J-Sandcastle was the borrower and J-Pad the
24 lender. The agreement required J-Sandcastle to pay J-Pad \$225,000 for a purported loan; however,
25 J-Pad did not loan any money to J-Sandcastle. Trial Transcript, Dk. 72, Pg. 66. [the Debtor] herself
26 made the loan to J-Sandcastle, though the loan was initially in the amount of \$175,000 Defendant
did not fund the balance of the \$225,000 loan until approximately 6 months later.” Exhibit 12 to
the Request for Judicial Notice, page 268 (Ins. 15-22). See also Exhibit 11 to the Request for
Judicial Notice at page 254 (Ins. 22-25) and page 255 (Ins. 1-5).

27 ¹² See Exhibit 3 to the Declaration of Shantal Malmed.

28 ¹³ See Exhibit 4 to the Declaration of Shantal Malmed, page 109.

1 Thereafter, as of February 24, 2021, the certificate of title to the Property reflected that Mr.
2 Pierpont and J-Pad were the “legal owners” (i.e., the lienholders) on the Property. Complaint ¶
3 34.¹⁴

4 On or about July 9, 2021, however, Mr. Pierpont submitted a signed “Lien Satisfied” form
5 to the HCD removing Mr. Pierpont and J-Pad as the lienholders on the Property.¹⁵ Complaint ¶ 35.

6 **2. J-Pad Postpetition Transfers**

7 Thereafter, as of August 3, 2021, the certificate of title to the Property did not reflect any
8 “legal owners” (i.e., lienholders) on the Property. Complaint ¶ 36.¹⁶

9 On or about August 6, 2021 (postpetition), the Debtor, individually, signed and submitted a
10 “Statement of Facts” to the HCD stating that the legal owner of the Property was J-Pad and that J-
11 Pad perfected its lien on January 14, 2019 (the “Sixth J-Pad Transfer”). Complaint ¶ 37.¹⁷

12 The Debtor also submitted with the August 6, 2021, Statement of Facts a “Statement to
13 Encumber” purportedly signed on January 14, 2019, reflecting that the “legal owner” of the
14 Property was only J-Pad (the “Seventh J-Pad Transfer”). Complaint ¶ 38.¹⁸

15 The First, Fourth, Fifth, Sixth, and Seventh J-Pad Transfers are collectively referred to as
16 the “J-Pad Transfers”.

17 J-Pad paid no consideration for the J-Pad Transfers. Complaint ¶ 40.¹⁹

18 On September 8, 2021, September 12, 2021, and September 24, 2021, the Debtor,
19 individually and/or through J-Pad or J-Sandcastle, purported to perfect or create additional liens on
20 the Property in favor of J-Pad, Steven Gallian, Brian Gallian, Justin Barclay, Ronald J. Pierpont,
21 Robert J. McLelland, and E. J. Gallian by filing multiple UCC Financing Statement Amendments

22 _____
23 ¹⁴ See Exhibit 5 to the Declaration of Shantal Malmed, page 124, 128, and 130.

24 ¹⁵ See Exhibit 5 to the Declaration of Shantal Malmed, page 132.

25 ¹⁶ See Exhibit 6 to the Declaration of Shantal Malmed, page 148.

26 ¹⁷ See Exhibit 6 to the Declaration of Shantal Malmed, page 151.

27 ¹⁸ See Exhibit 6 to the Declaration of Shantal Malmed, page 152.

28 ¹⁹ See Exhibit 12 to the Request for Judicial Notice, page 268.

(UCC3) with the California Secretary of State listing J-Pad, Steven Gallian, Brian Gallian, Justin Barclay, Mr. Pierpont, Robert J. Mclelland, and E. J. Gallian as additional secured parties (collectively, the “Postpetition Transfers”). The UCC filings failed to perfect liens against the Property. Complaint ¶ 44.²⁰

The Sixth J-Pad Transfer, the Seventh J-Pad Transfer and the Postpetition Transfers stated in Complaint ¶ 37-38 and ¶ 44 are collectively referred to as the “J-Pad Postpetition Transfers”.

II.

ARGUMENT

A. A Default Judgment Should be Entered against the Defendant Because It’s Default Has Been Entered

Rule 7055 of the Federal Rules of Bankruptcy Procedure provides that Fed. R. Civ. P. 55 applies in adversary proceedings. Rule 55 of the Federal Rules of Civil Procedure governs the entry of default and default judgment. With respect to the entry of default judgment, Rule 55(b)(2) provides that a judgment by default may be entered by the Court against a defendant who has been defaulted, that the party entitled to such judgment by default shall apply to the Court, and that no judgment by default shall be entered against an infant or an incompetent person unless represented in the action by a general guardian, conservator, or other fiduciary who has appeared.

The entry of a default judgment against the Defendant is appropriate because default has been entered against it due to its failure to plead or otherwise defend in response to the Complaint.

B. The Standard on a Motion for Default Judgment

“The effect of an entry of default, if not set aside, is to establish the liability of the defaulting party as a basis for default judgment. After defaulting, a party has no right to dispute the issue of liability.” James Wm. Moore, *Moore’s Federal Practice* § 55.32[1][a] (3rd ed. 2012). “On a motion for default judgment, the well-pleaded facts in the complaint relating to liability are taken as true.” *Id.* (citing *Geddes v. United Financial Group*, 559 F.2d 557, 560 (9th Cir. 1977)). Once a party’s default has been entered, the factual allegations in the complaint, except those

²⁰ See Exhibit 7 to the Declaration of Shantal Malmed.

concerning damages, are deemed to have been admitted by the non-responding party. Fed. R. Civ. P. 8(b)(6); *Geddes*, 559 F.2d at 560 (stating the general rule that “upon default[,], the factual allegations of the complaint, except those relating to the amount of damages, will be taken as true”). Despite this fact, the court must still “consider whether the unchallenged facts constitute a legitimate cause of action,” since a party in default does not admit mere conclusions of law.” 10A Charles Alan Wright, Arthur R. Miller, & Mary Kay Kane, *Federal Practice And Procedure: Civil* § 2688 (3d 1998) (footnote omitted); *Cripps v. Life Ins. Co. of N. America*, 980 F.2d 1261, 1267 (9th Cir. 1992) (“[N]ecessary facts not contained in the pleadings, and claims which are legally insufficient, are not established by default”); *Doe v. Qi*, 349 F. Supp. 2d 1258, 1272 (N.D. Cal. 2004) (“[Although] the factual allegations of [the] complaint together with other competent evidence submitted by the moving party are normally taken as true . . . this Court must still review the facts to insure that the Plaintiffs have properly stated claims for relief”). Also, Federal Rule of Civil Procedure 8(b)(6), made applicable herein by Federal Rule of Bankruptcy Procedure 7008, provides that “[a]n allegation – other than one relating to the amount of damages – is admitted if a responsive pleading is required and the allegation is not denied.”

Nevertheless, it is within the Court’s discretion whether to enter a default judgment. The Ninth Circuit has instructed that the following factors be considered: the possibility of prejudice to the plaintiff; the merits of the plaintiff’s substantive claim; the sufficiency of the complaint; the sum of money at stake in the action; the possibility of a dispute concerning material facts; whether the default was due to excusable neglect; and the strong policy favoring decisions on the merits. *Eitel v. McCool*, 782 F.2d 1470, 1471-72 (9th Cir. 1986).

C. The *Eitel v. McCool* Factors Favor Granting Default Judgment

Eitel provided various factors that the Court should consider in ruling on a motion for default judgment. *Eitel*, 782 F.2d at 1471. The Ninth Circuit has instructed that courts consider the following factors in deciding whether to enter default judgment: (1) the possibility of prejudice to plaintiff; (2) the merits of plaintiff’s substantive claims; (3) the sufficiency of the complaint; (4) the sum of money at stake in the action; (5) the possibility of a dispute

concerning the material facts; (6) whether defendant's default was the product of excusable neglect; and (7) the strong public policy favoring decisions on the merits. *Id.*, at 1471-72.

1. The possibility of prejudice to the Plaintiff

Absent a default judgment, the Plaintiff will be unable to avoid and preserve any liens that were created by the J-Pad Transfers and the J-Pad Postpetition Transfers. The Plaintiff believes that avoiding and preserving the liens is in the best interest of the estate and its creditors and will permit the Trustee to administer the property for the benefit of the estate and creditors.

2. The merits of the plaintiff's substantive claim

The Complaint alleges ten claims for relief. The first four claims for relief are based on recovery of fraudulent or voidable transfers. The fifth claim is for avoidance and recovery of postpetition transfers, and the sixth claim is for declaratory relief, the seventh claim is for turnover and the eighth claim is for breach of contract and the ninth and tenth claims are for unjust enrichment. The Plaintiff only seeks relief against the Defendant as to the first and fifth claims for relief. If the requested relief is granted, the Plaintiff intends to dismiss his remaining claims against the Defendant.

(a) Fraudulent or Avoidable Claims

A trustee or debtor in possession may avoid a fraudulent transfer of property if that transfer is avoidable under applicable state law or federal law. 11 U.S.C. § 544; *In re JTS Corp.*, 617 F.3d 1102, 1111 (9th Cir. 2010) (citing *In re United Energy Corp.*, 944 F.2d 589, 593 (9th Cir. 1991)). 11 U.S.C. § 550 provides that "to the extent that a transfer is avoided under section 544...[or] 548...the trustee may recover, for the benefit of the estate, the property transferred, or, if the court orders, the value of such property."

i. The Fraudulent J-Pad Transfers are Avoidable Under California Civil Code § 3439.04(a)(1) – First Claim for Relief

California Civil Code § 3439.04(a)(1), made applicable by 11 U.S.C. § 544, provides that

(a) A transfer made or obligation incurred by a debtor is fraudulent as to a creditor, whether the creditor's claim arose before or after the transfer was made or the obligation was incurred, if the debtor made the transfer or incurred the obligation as follows:

1 (1) With actual intent to hinder, delay, or defraud any creditor of
2 the debtor.

3 Cal. Civ. Code § 3439.04(a)(1).

4 Here, the Trustee pled in the Complaint, and the Debtor's schedules and the Court's Claims
5 Register further reveal, that there are actual creditors that were harmed by the J-Pad Transfers.²¹

6 In determining actual intent to hinder, delay or defraud, Cal. Civ. Code
7 § 3439.04(b) provides that consideration may be given, among other factors, to any of the
8 following:

- 9 (1) Whether the transfer or obligation was to an insider.
- 10 (2) Whether the debtor retained possession or control of the
11 property transferred after the transfer.
- 12 (3) Whether the transfer or obligation was disclosed or
13 concealed.
- 14 (4) Whether before the transfer was made or obligation was
15 incurred, the debtor had been sued or threatened with suit.
- 16 (5) Whether the transfer was of substantially all the debtor's
17 assets.
- 18 (6) Whether the debtor absconded.
- 19 (7) Whether the debtor removed or concealed assets.
- 20 (8) Whether the value of the consideration received by the debtor
21 was reasonably equivalent to the value of the asset transferred or the
22 amount of the obligation incurred.
- 23 (9) Whether the debtor was insolvent or became insolvent shortly
24 after the transfer was made or the obligation was incurred.
- 25 (10) Whether the transfer occurred shortly before or shortly after a
26 substantial debt was incurred.
- 27 (11) Whether the debtor transferred the essential assets of the
28 business to a lienholder who transferred the assets to an insider of the
debtor.

Cal. Civ. Code § 3439.04(b).

²¹ See Exhibits "8," "9," and "10" to the Request for Judicial Notice.

1 According to the 1986 Legislative Committee Comment of the California Assembly to Civil
2 Code § 3439.04, the presence of one or more of these badges of fraud does not create a
3 presumption of fraud, but is evidence from which an inference of fraudulent intent may be drawn.
4 *See also Burns v. Radovich*, 77 Cal. App. 2d 697, 176 P.2d 77, 81 (Cal. 1947) (“Indicia of fraud
5 when considered separately may be insufficient to establish fraud but, when considered together,
6 by their number and association may suffice as strong evidence of fraudulent intent”). Courts have
7 recognized that the existence of several badges of fraud can constitute conclusive evidence of
8 actual intent to defraud, absent “significantly clear” evidence of a legitimate supervening purpose.
9 *See, e.g., In re Acequia*, 34 F.3d 800, 804 (9th Cir. 1994), quoting *Max Sugarman Funeral Home,*
10 *Inc. v. A.D.B. Investors*, 926 F.2d 1248, 1254 (1st Cir. 1991); *accord In re Sherman*, 67 F.3d 1348,
11 1354 (8th Cir. 1995); *see also In re Kranich*, 53 B.R. 821, 823 (Bankr. M.D. Fla. 1985). Once a
12 trustee establishes indicia of fraud, the burden shifts to the transferee to prove some “legitimate
13 supervening purpose” for the transfers at issue. *In re Acequia*, 34 F.3d 800, 806 (9th Cir. 1994).

14 In the case at bar, there are a number of badges of fraud that lead to the conclusion of such
15 fraudulent intent in the J-Pad Transfers. These badges include:

16 **A) J-Pad is an Insider of the Debtor**

17 Section 3439.04(b) does not define the term “insider.” However, the definition of “insider”
18 under the Bankruptcy Code, for an individual, includes a “corporation of which the debtor is a
19 director, officer, or person in control.” 11 U.S.C. § 101(31). The Bankruptcy Code further provides
20 that the definition of “corporation” includes unincorporated limited liability companies. *See* 11
21 U.S.C. § 101(9)(A)(4). In addition, where a transfer is between related parties, the transfer is
22 subject to close scrutiny and gives rise to a presumption of actual fraudulent intent if the transfer is
23 without adequate consideration. *See Hyman v. Porter (In re Porter)*, 37 B.R. 56, 60-61 (Bankr.
24 E.D. Va. 1984).

25 In the case at bar, as alleged in the Complaint, the Debtor is the member and manager of the
26
27
28

1 Defendant. See Complaint ¶ 4.²² Therefore, the Defendant was an insider of the Debtor at the time
2 the J-Pad Transfers were made. The presumption of fraudulent intent establishes the Trustee's
3 prima facie case and shifts the burden of proof to establish the absence of fraudulent intent to the
4 Debtor. *Hyman*, 37 B.R. at 60-61.

5 **B) The J-Pad Transfers Were Made for No Consideration**

6 In addition to the above, the transfers at issue were made with no consideration, as alleged
7 in the Complaint (Complaint ¶ 40). As discussed above, the Defendant did not provide any
8 consideration for the J-Pad Transfers.

9 **C) The Debtor Retained Possession or Control of the Property**

10 The Debtor also retained possession and control of the Property following the transfers.
11 The Debtor's control is seen in the Debtor's ongoing residence of the Property, including on the
12 Petition Date.²³

13 **D) The Debtor Concealed Assets**

14 The Debtor was the manager and member of the Defendant transferee. The Debtor
15 concealed her equity interest in the Property by granting the liens to J-Pad, and others as alleged in
16 the Complaint, and further claiming in her schedules that J-Pad (i.e. the Defendant) had a \$175,000
17 lien on the Property.²⁴ Furthermore, this Court has already found that the Debtor made the J-Pad
18 Transfers with the actual intent to defraud the Debtor's creditors, stating in the Houser
19 Memorandum Decision that:

20 facts were presented to the Court demonstrating that [the Debtor]
21 further concealed her equity in the property through the granting of
22 liens to her business entities and family members...for example, in
23 late 2018, [the Debtor] also executed a promissory note and security
24 agreement on the mobile home by and between two entities that she
managed, J-Sandcastle and J-Pad, LLC. ("J-Pad"). J-Sandcastle was
the borrower and J-Pad the lender. The agreement required J-
Sandcastle to pay J-Pad \$225,000 for a purported loan; however, J-

25 ²² See Trial Transcript, case no. 8:21-bk-11710, Houser Lawsuit, docket no. 72, pages 104, 135-
26 136 (Debtor testified she is the member and 100% owner).

27 ²³ See Exhibit 1 to the Request for Judicial Notice, page 24.

28 ²⁴ See Exhibit 1 to the Request for Judicial Notice, page 43.

1 Pad did not loan any money to J-Sandcastle....[the Debtor] herself
2 made the loan to J-Sandcastle, though the loan was initially in the
3 amount of \$175,000 [the Debtor] did not fund the balance of the loan
4 until approximately 6 months later...None of the foregoing
5 information regarding the timing of funding, or source of funding,
6 was reflected in the executed documents. In her petition, [the Debtor]
7 scheduled J-Pad as a secured creditor, continuing the ongoing
8 concealment of her true interest in the loan...²⁵

9 Additionally, the HOA Lawsuit was still pending when the Debtor caused the First J-Pad
10 Transfer, and the Fourth J-Pad Transfer to be executed in favor of the Defendant. On May 6, 2019,
11 the HOA obtained the HOA Judgment against the Debtor in the amount of judgment in excess of
12 \$315,000. The J-Pad Transfers were made to conceal the equity in the Property from the HOA and
13 with actual intent to hinder, delay and defraud the Debtor's creditors, including the HOA.

14 **E) The Debtor Had Been Sued Before the J-Pad Transfers**
15 **Were Made**

16 Courts have found fraudulent intent where a lawsuit was imminent at the time of the subject
17 transfer. *United States v. May*, 600 F. Supp. 339, 342 (S.D. Cal. 1984); *see also Kaisha v. Dodson*,
18 423 B.R. 888, 901 (N.D. Cal. 2010).

19 The Debtor's Statement of Financial Affairs reflect that the Debtor was the defendant in
20 *Huntington Beach Gables Homeowners Association vs. Jamie Lynn Gallian*, Case No. 30-20170-
21 00962999-CU-HR-CJC, filed on April 11, 2017.²⁶ The Debtor was also one of the defendants in
22 *Huntington Beach Gables Homeowners Association vs. Sandra Bradley et al.*, Case No. 30-2017-
23 00913985-CU-CO-CJC, filed on December 22, 2017. The Debtor made the J-Pad Transfers on
24 November 16, 2018, January 14, 2019, August 20, 2020, December 4, 2020, July 9, 2021, August
25 3, 2021, August 6, 2021, September 8, 2021, September 12, 2021, and September 24, 2021,
26 respectively. The Debtor executed the J-Pad Transfers after the Debtor had been sued in the
27 aforementioned lawsuits. Accordingly, the lawsuits establish that the J-Pad Transfers were made
28 by the Debtor with actual intent to hinder, delay, or defraud the Debtor's creditors.

²⁵ See Exhibit 12 to the Request for Judicial Notice, page 268 (lns. 12-22) and page 269 (lns. 1-3).

²⁶ See Exhibit 1 to the Request for Judicial Notice at page 66.

(b) **Avoidance and Recovery of J-Pad Postpetition Transfers – Fifth Claim
for Relief**

11 U.S.C. § 549(a) of the Code permits the trustee to avoid a postpetition transfer of estate property, and section 550(a)(1) permits a trustee to recover the amount of the avoidable transfer from the initial transferee. 11 U.S.C. §§ 549(a), 550(a); *In re Montross*, 209 B.R. 943, 947–48 (B.A.P. 9th Cir. 1997). If a trustee seeks to recover a postpetition transfer under section 549, the trustee must show that a postpetition transfer occurred. *In re Allen*, 217 B.R. 952, 955 (Bankr.M.D. Fla.1998); *In re Mora*, 199 F.3d 1024, 1026 (9th Cir. 1999). The trustee must also show that the transfer was not authorized by either the bankruptcy court or the Code. 11 U.S.C. § 549(a). *In re Mora*, 199 F.3d 1024, 1026 (9th Cir. 1999).

Here, the Petition Date was July 9, 2021 and the J-Pad Postpetition Transfers were all executed on August 6, 2021, September 8, 2021, September 12, 2021, and September 24, 2021, and respectively. Debtor caused the J-Pad Postpetition Transfers to occur after the Petition Date and the J-Pad Postpetition Transfers were all executed after the Petition Date. The Court did not enter any court orders on the docket authorizing the J-Pad Postpetition Transfers. Thus, the Trustee may avoid and preserve the J-Pad Postpetition Transfers. 11 U.S.C. § 549(a).

3. The sufficiency of the complaint

The well-pleaded facts in the Complaint as to liability are taken as true.

4. The sum of money at stake in the action

The fourth *Eitel* factor balances “the amount of money at stake in relation to the seriousness of the [d]efendant[s’] conduct.” *PepsiCo, Inc. v. California Sec. Cans*, 238 F. Supp. 2d 1172, 1176 (C.D. Cal. 2002); *Eitel* 782 F.2d at 1471-72. This determination requires an examination of the recovery sought in light of the subject conduct to determine whether the remedy requested is appropriate. *Walters v. Statewide Concrete Barrier, Inc.*, No. C 04-2559 JSW, 2006 WL 2527776, 4 (N.D. Cal. Aug. 30, 2006) (“If the sum of money at issue is reasonably proportionate to the harm caused by the defendant’s actions, then default judgment is warranted”).

The Trustee’s first claim for relief, relating to the First, Fourth, Fifth, Sixth and Seventh J-Pad Transfers, and the fifth claim for relief, relating to the Post-Petition Transfers (as to J-Pad), the

Trustee does not seek recovery of a sum certain. Instead, the Trustee seeks to avoid and preserve the liens that the Debtor placed on the Property in favor of the Defendant – J-Pad. Therefore, the recovery sought (i.e. avoiding and preserving the liens on the Property) is directly related to the harm caused to the Debtor’s creditors by the fraudulent and post-petition transfers thereof.

5. The possibility of a dispute concerning material facts

Because the Defendant has failed to respond to the Complaint, the well-pleaded facts in the Complaint as to liability are to be taken as true. The Trustee has also provided additional evidence herewith to support his claims against the Defendant.

6. Whether the default was due to excusable neglect

After filing the Complaint, the Plaintiff served the Summons on the Defendant by mail. The deadline for the Defendant to file and serve a written response to the Complaint was August 2, 2023. No answer or other responsive pleading has been timely filed or served by the Defendant.

The Defendant has had ample time to timely answer the Complaint and failed to do so. The Defendant has defaulted. The entry of default allows the Plaintiff to avoid the transfers at issue, avoid and preserve the liens on the Property, and recover the sum of \$225,000 from J-Pad for the benefit of the estate and its creditors.

Based upon the above, the *Eitel* factors have been satisfied, and the Court should grant entry of default judgment.

III.

CONCLUSION

WHEREFORE, the Plaintiff requests that the Court grant its Motion in its entirety and enter default judgment against the Defendant as requested herein. The Plaintiff requests such other and further relief that this Court may deem just and proper.

DATED: April 5, 2024

DANNING, GILL, ISRAEL & KRASNOFF, LLP

By: /s/ Shantal Malméd

SHANTAL MALMED

Attorneys for Jeffrey I. Golden, Chapter 7 Trustee

DECLARATION OF SHANTAL MALMED

I, Shantal Malmed, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am associated with Danning, Gill, Israel & Krasnoff, LLP, attorneys of record for Jeffrey I. Golden, Chapter 7 Trustee. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto. I make this declaration in support of the Trustee's Motion for Default Judgment Against J-Pad LLC.

2. A true and correct copy of the secured promissory note executed by the Debtor on November 16, 2018 is attached hereto as Exhibit "2."

3. True and correct copies of the UCC-1 Financing Statements obtained from the California Secretary of State, filed on January 14, 2019 and purporting to create or perfect liens on the property located at 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649 (the "Property") are attached hereto, collectively, as Exhibit "3."

4. A true and correct copy of the February 1, 2021 Transaction Report of the Property obtained from the California Department of Housing and Community Development (the "HCD") is attached hereto as Exhibit "4."

5. A true and correct copy of the July 14, 2021 Transaction Report of the Property obtained from the HCD is attached hereto as Exhibit "5."

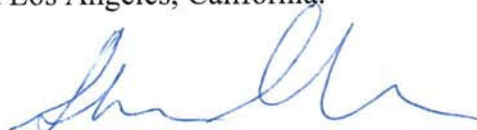
6. A true and correct copy of the August 10, 2021 Transaction Report of the Property obtained from the HCD is attached hereto as Exhibit "6."

7. True and correct copies of the UCC-3 Financing Statements obtained from the California Secretary of State, filed on December 14, 2020, September 8, 2021 and December 12,

1 2021 and purporting to create or perfect liens on the Property are attached hereto, collectively, as
2 Exhibit "7."

3
4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

6 Executed on this 5th day of April, 2024, at Los Angeles, California.

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9 Shantal Malmed
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REQUEST FOR JUDICIAL NOTICE

Jeffrey I. Golden, Chapter 7 Trustee (the “Trustee” or the “Plaintiff”) hereby respectfully requests that the Court take judicial notice of the following facts pursuant to Fed. R. Evid. 201(d):

1. On April 11, 2017, the Debtor was sued by the Huntington Beach Gables Homeowners Association (“HOA”) in Case No. 30-2017-00913985 (the “HOA Lawsuit”).

2. On November 8, 2018, the Orange County Superior Court (“OCSC”) granted a motion by the HOA for attorney’s fees against the Debtor, and on December 4, 2018, the OCSC entered an order on the motion, which reflected that the HOA had been awarded \$46,138 of attorney’s fees against the Debtor, plus interest. On May 6, 2019, the HOA obtained judgment against the Debtor in excess of \$315,000 (“HOA Judgment”).

3. On or about July 9, 2021 (the “Petition Date”), Jamie Lynn Gallian (the “Debtor”) commenced this case by filing a voluntary petition for relief under Chapter 7 of the Code. A true and correct copy of the Debtor’s Chapter 7 petition and schedules are attached hereto as Exhibit “1.”

4. On October 18, 2021, Houser Bros. Co (“Houser”) filed a complaint against the Debtor and initiated *Houser Bros. Co. v. Gallian*, Adv. Proc. No. 8:21-ap-01097-SC (the “Houser Lawsuit”), seeking denial of the Debtor’s discharge.

5. On October 25, 2022, claimant The Huntington Beach Gables Homeowner’s Association filed claim no. 1 in 8:21-bk-11710-SC. A true and correct copy of the proof of claim is attached hereto as Exhibit “8.”

6. On October 25, 2022, claimant Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates filed claim no. 2 in 8:21-bk-11710-SC. A true and correct copy of the proof of claim is attached hereto as Exhibit “9.”

7. On October 25, 2022, claimants Janine Jasso, Jennifer Paulin, Lori Burrett, Lee Gragnano, Lindy Beck, and Ted Phillips filed claim no. 4 in 8:21-bk-11710-SC. A true and correct copy of the proof of claim is attached hereto as Exhibit “10.”

8. Houser and the Debtor went to trial in the Houser Lawsuit on April 26, 2023 (Houser Lawsuit, docket no. 68). The trial transcript in the Houser Lawsuit was entered as Houser

1 Lawsuit, docket no. 72. A true and correct copy of relevant pages of the trial transcript are attached
2 hereto as Exhibit "11."

3 9. On May 23, 2023, the Court entered an order denying the Debtor's motion to amend
4 and vacate hearing and the memorandum decision after trial in the Houser Lawsuit (the "Houser
5 Memorandum Decision") (Houser Lawsuit, docket no. 81). A true and correct copy of the Houser
6 Memorandum Decision is attached hereto as Exhibit "12."

7 10. On June 30, 2023, the Trustee initiated this adversary proceeding by filing a
8 *Complaint: (1) to Avoid and Recover Fraudulent Transfers; (2) to Avoid and Recover Postpetition*
9 *Transfers; (3) for Declaratory Relief; (4) for Breach of Contract; (5) for Money Had and Received;*
10 *and (6) Unjust Enrichment* against J-Pad Co., LLC (the "Defendant") and several other defendants.
11 A true and correct copy of the June 30, 2023 Complaint underlying this action is attached hereto as
12 Exhibit "13."

13 11. A *Summons and Notice of Status Conference in Adversary Proceeding [LBR 7004-*
14 *1]* (the "Summons") was served by mail on the Defendant on July 6, 2023. A true and correct copy
15 of the Summons and proof of service is attached hereto as Exhibit "14."

16 12. On July 7, 2023, the Court entered judgment in *Houser Bros. Co. v. Gallian* (Adv.
17 Proc. No. 8:21-ap-01097-SC) denying the Debtor's discharge pursuant to 11 U.S.C. §§
18 727(a)(2)(A), (a)(4), and (a)(5). A true and correct copy of the judgment (Houser Lawsuit, docket
19 no. 100) is attached hereto as Exhibit "15."

20 13. The deadline for the Defendant to file and serve a written response to the Complaint
21 was August 2, 2023. No answer or other responsive pleading has been timely filed or served by the
22 Defendant.

23 14. On August 22, 2023, the Court entered default against the Defendant. A copy of the
24 Notice That Clerk Has Entered Default Against the Defendant is attached hereto as Exhibit "16."

25 DATED: April 5, 2024

DANNING, GILL, ISRAEL & KRASNOFF, LLP

26 By: 

27 SHANTAL MALMED

28 Attorneys for Jeffrey I. Golden, Chapter 7 Trustee

EXHIBIT 1

Fill in this information to identify your case:

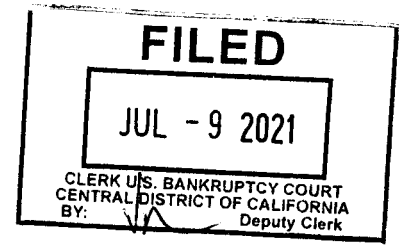
United States Bankruptcy Court for the:

CENTRAL DISTRICT OF CALIFORNIA

Case number (if known)

Chapter you are filing under:

- ☒ Chapter 7
☐ Chapter 11
☐ Chapter 12
☐ Chapter 13



☐ Check if this is an amended filing

Official Form 101

Voluntary Petition for Individuals Filing for Bankruptcy

04/20

The bankruptcy forms use *you* and *Debtor 1* to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint* case—and in joint cases, these forms use *you* to ask for information from both debtors. For example, if a form asks, “Do you own a car,” the answer would be *yes* if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Identify Yourself

About Debtor 1:

About Debtor 2 (Spouse Only in a Joint Case):

1. Your full name

Write the name that is on your government-issued picture identification (for example, your driver's license or passport).

Bring your picture identification to your meeting with the trustee.

Jamie

First name

Lynn

Middle name

Gallian

Last name and Suffix (Sr., Jr., II, III)

First name

Middle name

Last name and Suffix (Sr., Jr., II, III)

2. All other names you have used in the last 8 years

Include your married or maiden names.

Jamie L Gallian

3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)

xxx-xx-3936

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

About Debtor 1:

About Debtor 2 (Spouse Only in a Joint Case):

4. Any business names and Employer Identification Numbers (EIN) you have used in the last 8 years

☒ I have not used any business name or EINs.

☐ I have not used any business name or EINs.

Include trade names and
doing business as names

Business name(s)

Business name(s)

EIN

EIN

5. Where you live

If Debtor 2 lives at a different address:

**16222 Monterey Ln. SP#376
Huntington Beach, CA 92649**

Number, Street, City, State & ZIP Code

Number, Street, City, State & ZIP Code

Orange

County

County

If your mailing address is different from the one above, fill it in here. Note that the court will send any notices to you at this mailing address.

If Debtor 2's mailing address is different from yours, fill it in here. Note that the court will send any notices to this mailing address.

Number, P.O. Box, Street, City, State & ZIP Code

Number, P.O. Box, Street, City, State & ZIP Code

6. Why you are choosing this district to file for bankruptcy

Check one:

☒ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason.
Explain. (See 28 U.S.C. § 1408.)

Check one:

☐ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason.
Explain. (See 28 U.S.C. § 1408.)

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

Part 2: Tell the Court About Your Bankruptcy Case

7. **The chapter of the Bankruptcy Code you are choosing to file under** ☒ Check one. (For a brief description of each, see *Notice Required by 11 U.S.C. § 342(b) for Individuals Filing for Bankruptcy (Form 2010)*). Also, go to the top of page 1 and check the appropriate box.
- ☒ Chapter 7
- ☐ Chapter 11
- ☐ Chapter 12
- ☐ Chapter 13
-
8. **How you will pay the fee** ☒ **I will pay the entire fee when I file my petition.** Please check with the clerk's office in your local court for more details about how you may pay. Typically, if you are paying the fee yourself, you may pay with cash, cashier's check, or money order. If your attorney is submitting your payment on your behalf, your attorney may pay with a credit card or check with a pre-printed address.
- ☐ **I need to pay the fee in installments.** If you choose this option, sign and attach the *Application for Individuals to Pay The Filing Fee in Installments* (Official Form 103A).
- ☐ **I request that my fee be waived** (You may request this option only if you are filing for Chapter 7. By law, a judge may, but is not required to, waive your fee, and may do so only if your income is less than 150% of the official poverty line that applies to your family size and you are unable to pay the fee in installments). If you choose this option, you must fill out the *Application to Have the Chapter 7 Filing Fee Waived* (Official Form 103B) and file it with your petition.
-
9. **Have you filed for bankruptcy within the last 8 years?** ☒ No.
- ☐ Yes.
- | | | |
|----------------|------------|-------------------|
| District _____ | When _____ | Case number _____ |
| District _____ | When _____ | Case number _____ |
| District _____ | When _____ | Case number _____ |
-
10. **Are any bankruptcy cases pending or being filed by a spouse who is not filing this case with you, or by a business partner, or by an affiliate?** ☒ No.
- ☐ Yes.
- | | |
|-----------------------------|---------------------------|
| Debtor _____ | Relationship to you _____ |
| District _____ | When _____ |
| Case number, if known _____ | |
| Debtor _____ | Relationship to you _____ |
| District _____ | When _____ |
| Case number, if known _____ | |
-
11. **Do you rent your residence?** ☒ No. Go to line 12.
- ☐ Yes. Has your landlord obtained an eviction judgment against you?
- ☐ No. Go to line 12.
- ☐ Yes. Fill out *Initial Statement About an Eviction Judgment Against You* (Form 101A) and file it as part of this bankruptcy petition.

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Part 3: Report About Any Businesses You Own as a Sole Proprietor

12. Are you a sole proprietor of any full- or part-time business?

☒ No. Go to Part 4.

☐ Yes. Name and location of business

A sole proprietorship is a business you operate as an individual, and is not a separate legal entity such as a corporation, partnership, or LLC.

If you have more than one sole proprietorship, use a separate sheet and attach it to this petition.

Name of business, if any

Number, Street, City, State & ZIP Code

Check the appropriate box to describe your business:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ None of the above

13. Are you filing under Chapter 11 of the Bankruptcy Code, and are you a small business debtor or a debtor as defined by 11 U.S.C. § 1182(1)?

For a definition of *small business debtor*, see 11 U.S.C. § 101(51D).

If you are filing under Chapter 11, the court must know whether you are a small business debtor or a debtor choosing to proceed under Subchapter V so that it can set appropriate deadlines. If you indicate that you are a small business debtor or you are choosing to proceed under Subchapter V, you must attach your most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).

☒ No. I am not filing under Chapter 11.

☐ No. I am filing under Chapter 11, but I am NOT a small business debtor according to the definition in the Bankruptcy Code.

☐ Yes. I am filing under Chapter 11, I am a small business debtor according to the definition in the Bankruptcy Code, and I do not choose to proceed under Subchapter V of Chapter 11.

☐ Yes. I am filing under Chapter 11, I am a debtor according to the definition in § 1182(1) of the Bankruptcy Code, and I choose to proceed under Subchapter V of Chapter 11.

Part 4: Report if You Own or Have Any Hazardous Property or Any Property That Needs Immediate Attention

14. Do you own or have any property that poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety? Or do you own any property that needs immediate attention?

☒ No.

☐ Yes. What is the hazard?

If immediate attention is needed, why is it needed?

For example, do you own perishable goods, or livestock that must be fed, or a building that needs urgent repairs?

Where is the property?

Number, Street, City, State & Zip Code

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Part 5: Explain Your Efforts to Receive a Briefing About Credit Counseling

15. Tell the court whether you have received a briefing about credit counseling.

The law requires that you receive a briefing about credit counseling before you file for bankruptcy. You must truthfully check one of the following choices. If you cannot do so, you are not eligible to file.

If you file anyway, the court can dismiss your case, you will lose whatever filing fee you paid, and your creditors can begin collection activities again.

About Debtor 1:

You must check one:

- ☒ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.**

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

- ☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.**

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

- ☐ **I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.**

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy. If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

- ☐ **I am not required to receive a briefing about credit counseling because of:**
- ☐ **Incapacity.**
I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.
- ☐ **Disability.**
My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.
- ☐ **Active duty.**
I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver credit counseling with the court.

About Debtor 2 (Spouse Only in a Joint Case):

You must check one:

- ☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.**

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

- ☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.**

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

- ☐ **I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.**

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy.

If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

- ☐ **I am not required to receive a briefing about credit counseling because of:**
- ☐ **Incapacity.**
I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.
- ☐ **Disability.**
My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.
- ☐ **Active duty.**
I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Part 6: Answer These Questions for Reporting Purposes

16. What kind of debts do you have?	16a.	Are your debts primarily consumer debts? <i>Consumer debts</i> are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose." <input type="checkbox"/> No. Go to line 16b. <input checked="" type="checkbox"/> Yes. Go to line 17.
	16b.	Are your debts primarily business debts? <i>Business debts</i> are debts that you incurred to obtain money for a business or investment or through the operation of the business or investment. <input type="checkbox"/> No. Go to line 16c. <input type="checkbox"/> Yes. Go to line 17.
	16c.	State the type of debts you owe that are not consumer debts or business debts

17. Are you filing under Chapter 7?	<input type="checkbox"/> No.	I am not filing under Chapter 7. Go to line 18.
Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available for distribution to unsecured creditors?	<input checked="" type="checkbox"/> Yes.	I am filing under Chapter 7. Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available to distribute to unsecured creditors? <input type="checkbox"/> No <input type="checkbox"/> Yes

18. How many Creditors do you estimate that you owe?	<input checked="" type="checkbox"/> 1-49 <input type="checkbox"/> 50-99 <input type="checkbox"/> 100-199 <input type="checkbox"/> 200-999	<input type="checkbox"/> 1,000-5,000 <input type="checkbox"/> 5001-10,000 <input type="checkbox"/> 10,001-25,000	<input type="checkbox"/> 25,001-50,000 <input type="checkbox"/> 50,001-100,000 <input type="checkbox"/> More than 100,000
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19. How much do you estimate your assets to be worth?	<input type="checkbox"/> \$0 - \$50,000 <input type="checkbox"/> \$50,001 - \$100,000 <input checked="" type="checkbox"/> \$100,001 - \$500,000 <input type="checkbox"/> \$500,001 - \$1 million	<input type="checkbox"/> \$1,000,001 - \$10 million <input type="checkbox"/> \$10,000,001 - \$50 million <input type="checkbox"/> \$50,000,001 - \$100 million <input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> \$500,000,001 - \$1 billion <input type="checkbox"/> \$1,000,000,001 - \$10 billion <input type="checkbox"/> \$10,000,000,001 - \$50 billion <input type="checkbox"/> More than \$50 billion
--	---	--	--

20. How much do you estimate your liabilities to be?	<input type="checkbox"/> \$0 - \$50,000 <input type="checkbox"/> \$50,001 - \$100,000 <input type="checkbox"/> \$100,001 - \$500,000 <input checked="" type="checkbox"/> \$500,001 - \$1 million	<input type="checkbox"/> \$1,000,001 - \$10 million <input type="checkbox"/> \$10,000,001 - \$50 million <input type="checkbox"/> \$50,000,001 - \$100 million <input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> \$500,000,001 - \$1 billion <input type="checkbox"/> \$1,000,000,001 - \$10 billion <input type="checkbox"/> \$10,000,000,001 - \$50 billion <input type="checkbox"/> More than \$50 billion
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Part 7: Sign Below

For you

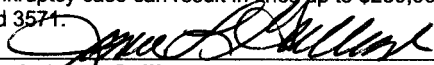
I have examined this petition, and I declare under penalty of perjury that the information provided is true and correct.

If I have chosen to file under Chapter 7, I am aware that I may proceed, if eligible, under Chapter 7, 11, 12, or 13 of title 11, United States Code. I understand the relief available under each chapter, and I choose to proceed under Chapter 7.

If no attorney represents me and I did not pay or agree to pay someone who is not an attorney to help me fill out this document, I have obtained and read the notice required by 11 U.S.C. § 342(b).

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I understand making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.


Jamie Lynn Gallian
 Signature of Debtor 1

Signature of Debtor 2

Executed on

7/9/2021
 MM / DD / YYYY

Executed on

MM / DD / YYYY

Debtor 1 Jamie Lynn Gallian

Case number (if known) _____

For your attorney, if you are represented by one

If you are not represented by an attorney, you do not need to file this page.

I, the attorney for the debtor(s) named in this petition, declare that I have informed the debtor(s) about eligibility to proceed under Chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each chapter for which the person is eligible. I also certify that I have delivered to the debtor(s) the notice required by 11 U.S.C. § 342(b) and, in a case in which § 707(b)(4)(D) applies, certify that I have no knowledge after an inquiry that the information in the schedules filed with the petition is incorrect.

Signature of Attorney for Debtor

Date

MM / DD / YYYY

Firm name

Number, Street, City, State & ZIP Code

Contact phone

Email address

Bar number & State

Debtor 1

First Name

Middle Name

Last Name

Case number (if known)

For you if you are filing this bankruptcy without an attorney

If you are represented by an attorney, you do not need to file this page.

The law allows you, as an individual, to represent yourself in bankruptcy court, but **you should understand that many people find it extremely difficult to represent themselves successfully. Because bankruptcy has long-term financial and legal consequences, you are strongly urged to hire a qualified attorney.**

To be successful, you must correctly file and handle your bankruptcy case. The rules are very technical, and a mistake or inaction may affect your rights. For example, your case may be dismissed because you did not file a required document, pay a fee on time, attend a meeting or hearing, or cooperate with the court, case trustee, U.S. trustee, bankruptcy administrator, or audit firm if your case is selected for audit. If that happens, you could lose your right to file another case, or you may lose protections, including the benefit of the automatic stay.

You must list all your property and debts in the schedules that you are required to file with the court. Even if you plan to pay a particular debt outside of your bankruptcy, you must list that debt in your schedules. If you do not list a debt, the debt may not be discharged. If you do not list property or properly claim it as exempt, you may not be able to keep the property. The judge can also deny you a discharge of all your debts if you do something dishonest in your bankruptcy case, such as destroying or hiding property, falsifying records, or lying. Individual bankruptcy cases are randomly audited to determine if debtors have been accurate, truthful, and complete. **Bankruptcy fraud is a serious crime; you could be fined and imprisoned.**

If you decide to file without an attorney, the court expects you to follow the rules as if you had hired an attorney. The court will not treat you differently because you are filing for yourself. To be successful, you must be familiar with the United States Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the local rules of the court in which your case is filed. You must also be familiar with any state exemption laws that apply.

Are you aware that filing for bankruptcy is a serious action with long-term financial and legal consequences?

☒ No
☐ Yes

Are you aware that bankruptcy fraud is a serious crime and that if your bankruptcy forms are inaccurate or incomplete, you could be fined or imprisoned?

☒ No
☐ Yes

Did you pay or agree to pay someone who is not an attorney to help you fill out your bankruptcy forms?

☒ No

☐ Yes. Name of Person _____

Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119).

By signing here, I acknowledge that I understand the risks involved in filing without an attorney. I have read and understood this notice, and I am aware that filing a bankruptcy case without an attorney may cause me to lose my rights or property if I do not properly handle the case.

Signature of Debtor 1

Date

7/9/2021
MM / DD / YYYY

Contact phone

Cell phone

Email address

Signature of Debtor 2

Date

MM / DD / YYYY

Contact phone

Cell phone

Email address

STATEMENT OF RELATED CASES
INFORMATION REQUIRED BY LBR 1015-2
UNITED STATES BANKRUPTCY COURT, CENTRAL DISTRICT OF CALIFORNIA

1. A petition under the Bankruptcy Act of 1898 or the Bankruptcy Reform Act of 1978 has previously been filed by or against the debtor, his/her spouse, his or her current or former domestic partner, an affiliate of the debtor, any copartnership or joint venture of which debtor is or formerly was a general or limited partner, or member, or any corporation of which the debtor is a director, officer, or person in control, as follows: (Set forth the complete number and title of each such of prior proceeding, date filed, nature thereof, the Bankruptcy Judge and court to whom assigned, whether still pending and, if not, the disposition thereof. If none, so indicate. Also, list any real property included in Schedule A/B that was filed with any such prior proceeding(s).)

None.

2. (If petitioner is a partnership or joint venture) A petition under the Bankruptcy Act of 1898 or the Bankruptcy Reform Act of 1978 has previously been filed by or against the debtor or an affiliate of the debtor, or a general partner in the debtor, a relative of the general partner, general partner of, or person in control of the debtor, partnership in which the debtor is a general partner, general partner of the debtor, or person in control of the debtor as follows: (Set forth the complete number and title of each such prior proceeding, date filed, nature of the proceeding, the Bankruptcy Judge and court to whom assigned, whether still pending and, if not, the disposition thereof. If none, so indicate. Also, list any real property included in Schedule A/B that was filed with any such prior proceeding(s).)

None.

3. (If petitioner is a corporation) A petition under the Bankruptcy Act of 1898 or the Bankruptcy Reform Act of 1978 has previously been filed by or against the debtor, or any of its affiliates or subsidiaries, a director of the debtor, an officer of the debtor, a person in control of the debtor, a partnership in which the debtor is general partner, a general partner of the debtor, a relative of the general partner, director, officer, or person in control of the debtor, or any persons, firms or corporations owning 20% or more of its voting stock as follows: (Set forth the complete number and title of each such prior proceeding, date filed, nature of proceeding, the Bankruptcy Judge and court to whom assigned, whether still pending, and if not, the disposition thereof. If none, so indicate. Also, list any real property included in Schedule A/B that was filed with any such prior proceeding(s).)

None.

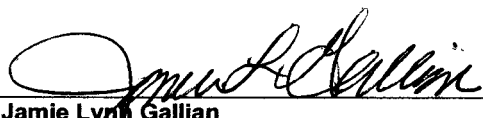
4. (If petitioner is an individual) A petition under the Bankruptcy Reform Act of 1978, including amendments thereof, has been filed by or against the debtor within the last 180 days: (Set forth the complete number and title of each such prior proceeding, date filed, nature of proceeding, the Bankruptcy Judge and court to whom assigned, whether still pending, and if not, the disposition thereof. If none, so indicate. Also, list any real property included in Schedule A/B that was filed with any such prior proceeding(s).)

8:03-bk-1856-JB; Chapter 7; Central District of California - Santa Ana; Filed 08/04/2003; Discharged 11/17/2003

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed at Santa Ana, California.

Date: 7/9/2003



Jamie Lynn Gallian
Signature of Debtor 1

Signature of Debtor 2

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106Sum

Summary of Your Assets and Liabilities and Certain Statistical Information

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Fill out all of your schedules first; then complete the information on this form. If you are filing amended schedules after you file your original forms, you must fill out a new *Summary* and check the box at the top of this page.

Part 1: Summarize Your Assets

	Your assets Value of what you own
1. Schedule A/B: Property (Official Form 106A/B)	
1a. Copy line 55, Total real estate, from Schedule A/B.....	\$ 235,000.00
1b. Copy line 62, Total personal property, from Schedule A/B.....	\$ 19,634.34
1c. Copy line 63, Total of all property on Schedule A/B.....	\$ 254,634.34

Part 2: Summarize Your Liabilities

	Your liabilities Amount you owe
2. Schedule D: Creditors Who Have Claims Secured by Property (Official Form 106D)	
2a. Copy the total you listed in Column A, <i>Amount of claim</i> , at the bottom of the last page of Part 1 of Schedule D...	\$ 561,789.00
3. Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 106E/F)	
3a. Copy the total claims from Part 1 (priority unsecured claims) from line 6e of Schedule E/F.....	\$ 0.00
3b. Copy the total claims from Part 2 (nonpriority unsecured claims) from line 6j of Schedule E/F.....	\$ 427,177.76
Your total liabilities	\$ 988,966.76

Part 3: Summarize Your Income and Expenses

4. Schedule I: Your Income (Official Form 106I)	
Copy your combined monthly income from line 12 of Schedule I.....	\$ 1,000.00
5. Schedule J: Your Expenses (Official Form 106J)	
Copy your monthly expenses from line 22c of Schedule J.....	\$ 2,676.00

Part 4: Answer These Questions for Administrative and Statistical Records

6. **Are you filing for bankruptcy under Chapters 7, 11, or 13?**
- ☐ No. You have nothing to report on this part of the form. Check this box and submit this form to the court with your other schedules.
- ☒ Yes
7. **What kind of debt do you have?**
- ☒ **Your debts are primarily consumer debts.** Consumer debts are those "incurred by an individual primarily for a personal, family, or household purpose." 11 U.S.C. § 101(8). Fill out lines 8-9g for statistical purposes. 28 U.S.C. § 159.
- ☐ **Your debts are not primarily consumer debts.** You have nothing to report on this part of the form. Check this box and submit this form to the court with your other schedules.

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

8. **From the Statement of Your Current Monthly Income:** Copy your total current monthly income from Official Form 122A-1 Line 11; **OR**, Form 122B Line 11; **OR**, Form 122C-1 Line 14.

\$ **1,000.00**

9. **Copy the following special categories of claims from Part 4, line 6 of Schedule E/F:**

From Part 4 on Schedule E/F, copy the following:

	Total claim
9a. Domestic support obligations (Copy line 6a.)	\$ 0.00
9b. Taxes and certain other debts you owe the government. (Copy line 6b.)	\$ 0.00
9c. Claims for death or personal injury while you were intoxicated. (Copy line 6c.)	\$ 0.00
9d. Student loans. (Copy line 6f.)	\$ 0.00
9e. Obligations arising out of a separation agreement or divorce that you did not report as priority claims. (Copy line 6g.)	\$ 0.00
9f. Debts to pension or profit-sharing plans, and other similar debts. (Copy line 6h.)	+\$ 0.00
9g. Total. Add lines 9a through 9f.	\$ 0.00

Fill in this information to identify your case and this filing:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse, if filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number			

☐ Check if this is an amended filing

Official Form 106A/B

Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

- ☐ No. Go to Part 2.
- ☒ Yes. Where is the property?

Located on APN 178-011-16, Space No. 376

1.1

16222 Monterey Ln Space #376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

Personal Residence of Debtor since 11/1/2018
2014 Skyline Custom Villa Manufactured Home
Decal No. LBM1081
Serial Number AC7V710394GB 56'x15'2"
Serial Number AC7V710394GA 60'x15'2"

What is the property? Check all that apply

- ☐ Single-family home
- ☐ Duplex or multi-unit building
- ☐ Condominium or cooperative
- ☒ Manufactured or mobile home
- ☐ Land
- ☐ Investment property
- ☐ Timeshare
- ☐ Other

Who has an interest in the property? Check one

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?	Current value of the portion you own?
\$235,000.00	\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.

Fee simple

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property identification number: LPT APN 891-569-62

Registered Title with HCD Debtor's single member LLC, J-Sandcastle Co, LLC

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$235,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

- ☐ No
☒ Yes

3.1 Make: **Kia**
Model: **Sportage**
Year: **2020**
Approximate mileage: _____
Other information: _____

**Location: 16222 Monterey Ln
#376, Huntington Beach CA
92649
(LEASE)**

Who has an interest in the property? Check one

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another

☐ Check if this is community property
(see instructions)

Do not deduct secured claims or exemptions. Put
the amount of any secured claims on *Schedule D:
Creditors Who Have Claims Secured by Property*.

**Current value of the
entire property?**

\$0.00

**Current value of the
portion you own?**

\$0.00

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories

Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
☐ Yes

**5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for
pages you have attached for Part 2. Write that number here.....=>**

\$0.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

**Current value of the
portion you own?**
Do not deduct secured
claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

- ☐ No
☒ Yes. Describe.....

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$4,500.00

7. Electronics

*Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices
including cell phones, cameras, media players, games*

- ☒ Yes. Describe **Wall Television, Computer, Printer.**
☐ No.

\$ 500.00

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

8. Collectibles of value

*Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections;
other collections, memorabilia, collectibles*

- ☒ No
☐ Yes. Describe.....

9. Equipment for sports and hobbies

*Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools;
musical instruments*

- ☒ No
☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

- ☒ No
☐ Yes. Describe.....

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

11. Clothes

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No

☒ Yes. Describe.....

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$1,000.00

12. Jewelry

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☒ Yes. Describe

☐ No

20 year old Movado Wrist-watch 40th birthday gift; Costume jewelry from Mother and Grandmother Misc/ sized rings, various non-gold chains and bracelets, earrings.

\$1,000.00

13. Non-farm animals

Examples: Dogs, cats, birds, horses

☒ Yes. Describe

☐ No.

5-year old Rescued Wired Terrier Dog-White "Ammie"

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

14. Any other personal and household items you did not already list, including any health aids you did not list

☒ No

☐ Yes. Give specific information.....

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here

\$7,000.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☒ No

☐ Yes.....

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No

☒ Yes.....

Institution name:

17.1	Checking and savings	J-Sandcastle Co LLC - Chase - Un-cashed Tendered Space 376 Rent Checks	\$ 8,050.00
		Alliant Credit Union (Personal) Stimulus Ck	\$ 4,048.34

18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☒ No

☐ Yes..... Institution or issuer name:

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

☐ No

☒ Yes. Give specific information about them.....

Name of entity:

% of ownership:

J-Sandcastle Co., LLC - Debtor's single member LLC

(Purpose is to hold Registered title with HCD, to Debtor's primary residence) LBM1081

100 %

\$0.00

Debtor 1 **Jamie Lynn Gallian** Case number (if known) _____

J-Pad, LLC

(Debtor owns 1/3 interest in LLC; only purpose
is to hold a note and UCC-1 filing on Debtor's
primary residence) LBM1081

33.33 %

\$0.00

20. Government and corporate bonds and other negotiable and non-negotiable instruments

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

☒ No

☐ Yes. Give specific information about them

Issuer name:

21. Retirement or pension accounts

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☐ No

☒ Yes. List each account separately.

Type of account:

Institution name:

IRA

Fidelity

\$7,400.00

22. Security deposits and prepayments

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

No

☒ Yes.

Institution name or individual:

Houser Bros Co. dba Rancho Del Rey Mobilehome Estates

Ground Lease Deposit (Ryan) Agreement Space 376 - 1/1/2006

\$ 686.00

23. Annuities (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No

☐ Yes.....

Issuer name and description.

24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

☒ No

☐ Yes.....

Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c):

25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit

☒ No

☐ Yes. Give specific information about them...

26. Patents, copyrights, trademarks, trade secrets, and other intellectual property

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No

☐ Yes. Give specific information about them...

27. Licenses, franchises, and other general intangibles

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No

☐ Yes. Give specific information about them...

Money or property owed to you?

**Current value of the
portion you own?**
Do not deduct secured
claims or exemptions.

28. Tax refunds owed to you

☒ No

☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. Family support

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

☐ Yes. Give specific information.....

30. Other amounts someone owes you

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No

☐ Yes. Give specific information..

31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No

☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund
value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

No

Father, DOD 6/17/2000, Charles J. Bradley, Jr. Probate OCSC
30-2017-00915711

\$ unknown

☒ Yes. Give specific information..

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

No

☒ Yes. Describe each claim.....

Personal Injury: Against HOA Date of Injury 8/5/2018; Severe nerve injury to
top of left foot and left wrist Injury; occurred in the HOA common area of APN
178-771-03, located on APN 178-011-16,

\$ unknown

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No

☒ Yes. Describe each claim.....

Personal injury claims against Huntington Beach Gables
Homeowner's Association and Ind. Jesus Jasso Jr.;
DOI: 8/5/2018; Case No.: 30-2020-01153679

\$ unknown

Potential insurance bad faith claim against Mercury
Insurance Failure to Indemnify; No lawsuit filed yet.
Related to Case No(s): 30-2017-00913985, 30-2017-00962999

\$ unknown

Real estate failure to disclose, claim against previous
homeowner Sandra Bradley; DOI: 04/11/2017; No lawsuit
filed yet.

\$ unknown

Houser Bros Co GP dba Rancho Del Rey Mobilehome Estates
Retaliation; Trespassing/Unlawful Entry; Wrongful Eviction;
Forcible Detainer; Cruelty to an animal causing death.
Failure to offer and execute rental agreement.

\$ unknown

35. Any financial assets you did not already list

☒ No

☐ Yes. Give specific information..

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$20,184.34

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.

☐ Yes. Go to line 38.

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

- ☒ No. Go to Part 7.
☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

- ☒ No
☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		\$235,000.00
56. Part 2: Total vehicles, line 5	\$0.00	
57. Part 3: Total personal and household items, line 15	\$ 7,000.00	
58. Part 4: Total financial assets, line 36	\$ 20,184.34	
59. Part 5: Total business-related property, line 45	\$0.00	
60. Part 6: Total farm- and fishing-related property, line 52	\$0.00	
61. Part 7: Total other property not listed, line 54	+ \$0.00	
62. Total personal property. Add lines 56 through 61...	\$27,184.34	Copy personal property total \$27,184.34
63. Total of all property on Schedule A/B. Add line 55 + line 62		\$262,184.34

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA			
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106C

Schedule C: The Property You Claim as Exempt

4/19

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Using the property you listed on *Schedule A/B: Property* (Official Form 106A/B) as your source, list the property that you claim as exempt. If more space is needed, fill out and attach to this page as many copies of *Part 2: Additional Page* as necessary. On the top of any additional pages, write your name and case number (if known).

For each item of property you claim as exempt, you must specify the amount of the exemption you claim. One way of doing so is to state a specific dollar amount as exempt. Alternatively, you may claim the full fair market value of the property being exempted up to the amount of any applicable statutory limit. Some exemptions—such as those for health aids, rights to receive certain benefits, and tax-exempt retirement funds—may be unlimited in dollar amount. However, if you claim an exemption of 100% of fair market value under a law that limits the exemption to a particular dollar amount and the value of the property is determined to exceed that amount, your exemption would be limited to the applicable statutory amount.

Part 1: Identify the Property You Claim as Exempt

1. Which set of exemptions are you claiming? Check one only, even if your spouse is filing with you.

- ☒ You are claiming state and federal nonbankruptcy exemptions. 11 U.S.C. § 522(b)(3)
- ☐ You are claiming federal exemptions. 11 U.S.C. § 522(b)(2)

2. For any property you list on *Schedule A/B* that you claim as exempt, fill in the information below.

Brief description of the property and line on <i>Schedule A/B</i> that lists this property	Current value of the portion you own Copy the value from <i>Schedule A/B</i>	Amount of the exemption you claim Check only one box for each exemption.	Specific laws that allow exemption
Location: 16222 Monterey Ln #376, Huntington Beach CA 92649 Line from <i>Schedule A/B</i> : 6.1	\$7,000.00	<input checked="" type="checkbox"/> \$,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
Checking and savings: Alliant Credit= Union Stimulous Cks Line from <i>Schedule A/B</i> : 17.1	\$4,048.34	<input checked="" type="checkbox"/> \$4,048.34 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 541(b)(11)
Checking and savings: Chase Bank Line from <i>Schedule A/B</i> : 17.1 8 months uncashed rent checks tendered to Houser Bros. dba Rancho Del Rey MHE/Fidelity 401K	\$8,050.00	<input checked="" type="checkbox"/> \$8,050 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.070
J-Sandcastle Co., LLC - Debtor's single member LLC (Purpose is to hold Registered title with HCD to Debtor's primary residence) 100 % ownership Line from <i>Schedule A/B</i> : 19.1	\$0.00	<input checked="" type="checkbox"/> \$0.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.060

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own Copy the value from Schedule A/B	Amount of the exemption you claim Check only one box for each exemption.	Specific laws that allow exemption
J-Pad, LLC (Debtor owns 1/3 interest in LLC; only purpose is to hold a note and UCC-1 filing on Debtor's primary residence) 33.33 % ownership Line from Schedule A/B: 19.2	<u>\$0.00</u>	<input checked="" type="checkbox"/> <u>\$0.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.060
IRA: Fidelity IRA Line from Schedule A/B: 21.1	<u>\$7400.00</u>	<input checked="" type="checkbox"/> <u>100%</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.115(a)(1) & (2), (b)
Personal injury claims against Huntington Beach Gables Homeowner's Association and Jesus Jasso Jr.; DOI: 8/5/2018; Case No.: 30-2020-01153679 Line from Schedule A/B: 34.1	<u>unknown</u> <u>\$0.00</u>	<input checked="" type="checkbox"/> <u>100%</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.140
Potential insurance bad faith claim against Mercury Insurance related to claim against Huntington Beach Gables Homeowner's Association; No lawsuit filed yet. Related to Case Nos.: 30-2017-00913985, 30-2017-00962999 Line from Schedule A/B: 34.2	<u>unknown</u> <u>\$0.00</u>	<input checked="" type="checkbox"/> <u>100%</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.140
Real estate fraud; Failure to disclose, claim against Sandra Bradley; DOI: 04/11/2017; No lawsuit filed yet. Line from Schedule A/B: 34.3	<u>unknown</u> <u>\$0.00</u>	<input checked="" type="checkbox"/> <u>100%</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.140
Restitution claim against Jesus Jasso Jr. from PC §242 OCDA Case no.: 19WM09951 Line from Schedule A/B: 34.4	<u>Unknown</u> <u>\$0.00</u>	<input checked="" type="checkbox"/> <u>100%</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.140

3. **Are you claiming a homestead exemption of more than \$170,350?**
(Subject to adjustment on 4/01/22 and every 3 years after that for cases filed on or after the date of adjustment.)
- ☒ No
- ☐ Yes. Did you acquire the property covered by the exemption within 1,215 days before you filed this case?
- ☐ No
- ☐ Yes

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☐ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

Column A	Column B	Column C
Amount of claim Do not deduct the value of collateral.	Value of collateral that supports this claim	Unsecured portion if any
\$0.00	\$235,000.00	\$0.00

2.1 Houser Bros. Co.

Creditor's Name
**DBA Rancho Del Rey
Mobilehome Estates
16222 Monterey Ln
Huntington Beach, CA
92649**

Number, Street, City, State & Zip Code

Describe the property that secures the claim:

**16222 Monterey Ln #376 Huntington Beach,
CA 92649 Orange County Registered HCD
Title held by Debtor's single member LLC -
J-Sandcastle Co, LLC**

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit

Who owes the debt? Check one.

- ☒ Debtor 1 and another (J-Sandcastle Co, LLC)
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

☒ Other (including a right to offset)

**Unexpired term of 80-yr. Ground Leasehold - Tract No. 10542,
Unit 4, Space 376.**

Date debt was incurred **11/1/2018 ongoing** Last 4 digits of account number **0376**

Debtor 1 **Jamie Lynn Gallian**

First Name Middle Name Last Name

Case number (if known)

2.2 J-Pad, LLC

Creditor's Name
4519 Ponderosa Way
Yorba Linda, CA 92886

Number, Street, City, State & Zip Code

Ron Pierpont

Creditor's Name
4519 Ponderosa Way
Yorba Linda, CA 92886

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

1/14/2019;

Date debt was incurred 8/20/2020.

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County, HCD Title held by Debtor's single member LLC - J-Sandcastle Co, LLC

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☒ An agreement you made (such as mortgage or secured car loan) **Manufactured Home Financing Note**
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit

☒ Other (including a right to offset) **UCC-1 File No. 19-7691905279 Filing Date: 1/14/2019; Encumbrance; HCD Lien perfected 8/20/2020, Ronald J. Pierpont (Loan WJC 8/7/2019, 1/27/2020)**

Last 4 digits of account number **LBM1081**

\$175,000.00 \$235,000.00 \$0.00

2.3 Kia Motors Finance

Creditor's Name

PO Box 20815
Fountain Valley, CA
92728

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred

Last 4 digits of account number **9742**

Describe the property that secures the claim:

2020 Kia Sportage
Location: 16222 Monterey Ln #376, Huntington Beach CA 92649 (LEASE)

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit
☒ Other (including a right to offset) **Auto Lease**

\$4,186.00 \$0.00 \$4,186.00

2.4 Orange County Tax Assessor

Creditor's Name

P.O. Box 149
Santa Ana, CA 92702

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred

Last 4 digits of account number **Decal LBM 1081; APN: 891-569-62**

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County Title held by Debtor's single member LLC - J-Sandcastle Co, LLC, APN 891-569-62

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit
☒ Other (including a right to offset) **Property Taxes**

\$0.00 \$235,000.00 \$0.00

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

First Name Middle Name Last Name

2.5

**The Huntington Beach
Gables Homeowners
Association**

Creditor's Name
c/o Epsten Grinnell & Howell,
APC
10200 Willow Creek Road, Ste 100
San Diego, CA 92131;
c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653
Number, Street, City, State & Zip Code

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington
Beach, CA 92649 Orange County HCD
Title held by Debtor's single member
LLC - J-Sandcastle Co, LLC

\$319,653.59

\$235,000.00

\$241,319.59

As of the date you file, the claim is: Check all that apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☒ Judgment lien from a lawsuit

☐ Other (including a right to offset)

EJ-1

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a community debt

Date debt was incurred May 6, 2019

Last 4 digits of account number OCJC 30-2017-00913985

2.6

**The Huntington Beach
Gables Homeowners
Association**

Creditor's Name
c/o Epsten Grinnell & Howell, APC
10200 Willow Creek Road, Ste 100
San Diego, CA 92131;
c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653
Number, Street, City, State & Zip Code

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington
Beach, CA 92649 Orange County HCD
Title held by Debtor's single member
LLC - J-Sandcastle Co, LLC

\$9,265.00

\$235,000.00

\$9,265.00

As of the date you file, the claim is: Check all that apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☒ Judgment lien from a lawsuit

☐ Other (including a right to offset)

EJ-001 2019000148568 - filed OC REC. 5/3/2019

Date debt was incurred March 21, 2019

Last 4 digits of account number OCJC 30-2017-00962999

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a community debt

Debtor 1 **Jamie Lynn Gallian**

First Name

Middle Name

Last Name

Case number (if known)

2.7

**Huntington Beach Gables
Homeowners Association**

Creditor's Name:

**Jasso; Gragnano; Phillips; Beck;
Paulin; Burrett.**

c/o Gordon Rees Scully & Mansukhani

**633 W 5th Street, 52nd Floor
Los Angeles, CA 90071**

**c/o Epstein Grinnell & Howell, APC
10200 Willow Creek Road, Ste 100
San Diego, CA 92131;**

Number, Street, City, State & Zip Code

Describe the property that secures the claim:

\$53,684.41

\$235,000.00

\$53,684.41

**16222 Monterey Ln #376 Huntington
Beach, CA 92649 Orange County HCD
Title held by Debtor's single member
LLC - J-Sandcastle Co, LLC**

As of the date you file, the claim is: Check all that
apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured
car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☐ Judgment lien from a lawsuit

☒ Other (including a right to offset)

Judgment Lien (JL1) File # U200003862424 -7/26/2020

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a
community debt

Date debt was incurred **Dec. 4, 2018**

Last 4 digits of account number **OCJC 30-2017-00913985**

Add the dollar value of your entries in Column A on this page. Write that number here:

\$561,789.00

If this is the last page of your form, add the dollar value totals from all pages.

Write that number here:

\$561,789.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106E/F

Schedule E/F: Creditors Who Have Unsecured Claims

12/15

Be as complete and accurate as possible. Use Part 1 for creditors with PRIORITY claims and Part 2 for creditors with NONPRIORITY claims. List the other party to any executory contracts or unexpired leases that could result in a claim. Also list executory contracts on Schedule A/B: Property (Official Form 106A/B) and on Schedule G: Executory Contracts and Unexpired Leases (Official Form 106G). Do not include any creditors with partially secured claims that are listed in Schedule D: Creditors Who Have Claims Secured by Property. If more space is needed, copy the Part you need, fill it out, number the entries in the boxes on the left. Attach the Continuation Page to this page. If you have no information to report in a Part, do not file that Part. On the top of any additional pages, write your name and case number (if known).

Part 1: List All of Your PRIORITY Unsecured Claims

1. Do any creditors have priority unsecured claims against you?

- ☒ No. Go to Part 2.
☐ Yes.

Part 2: List All of Your NONPRIORITY Unsecured Claims

3. Do any creditors have nonpriority unsecured claims against you?

- ☐ No. You have nothing to report in this part. Submit this form to the court with your other schedules.
☒ Yes.

4. List all of your nonpriority unsecured claims in the alphabetical order of the creditor who holds each claim. If a creditor has more than one nonpriority unsecured claim, list the creditor separately for each claim. For each claim listed, identify what type of claim it is. Do not list claims already included in Part 1. If more than one creditor holds a particular claim, list the other creditors in Part 3. If you have more than three nonpriority unsecured claims fill out the Continuation Page of Part 2.

4.1	BS Investors, LP G/HB	Last 4 digits of account number	0376	Total claim	Unknown
	Nonpriority Creditor's Name 18201 Von Karmen Ste. 450 Irvine, CA 92612	When was the debt incurred?	11/1/2018-present		
	Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify OCSC Filed 1/2/2019 30-2019-0101423			

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

<div style="border: 1px solid black; padding: 2px;">4.2</div>	Gordon Rees Scully & Mansukhani Nonpriority Creditor's Name 633 W 5th Street, 52nd Floor Los Angeles, CA 90071 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ Unknown When was the debt incurred? <u>12/4/2018; 5/6/2019</u> As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify OCSC Case No. 30-2017-00913985 Huntington Beach Gables Homeowners Association; Lee Gragnano; Ted Phillips; Lindy Beck; Janine Jasso; Jennifer Paulin; Lori Burrett
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<div style="border: 1px solid black; padding: 2px;">4.3</div>	Houser Bros. Co. Nonpriority Creditor's Name dba Rancho Del Rey Mobile Home Estates 17610 Beach Blvd Ste. 32 Huntington Beach, CA 92647 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number <u>0376</u> Unknown When was the debt incurred? <u>11/1/2018-present</u> As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify Unlawful Detainer Lawsuit Filed 1/2/2019 OCSC 30-2019-01041423
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<div style="border: 1px solid black; padding: 2px;">4.4</div>	Internal Revenue Service Nonpriority Creditor's Name PO Box 7346 Philadelphia, PA 19101-7346 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ \$3,361.00 When was the debt incurred? _____ As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify Income Taxes
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Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

<div style="border: 1px solid black; padding: 2px; display: inline-block;">4.5</div>	James H Casello Nonpriority Creditor's Name Casello & Lincoln, Attorneys at Law 525 N Cabrillo Park Drive Ste 104 Santa Ana, CA 92701 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ When was the debt incurred? _____ As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify Misc. Debt.	Unknown
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<div style="border: 1px solid black; padding: 2px; display: inline-block;">4.6</div>	Janine Jasso c/o Huntington Beach Gables Homeowners Association Nonpriority Creditor's Name: Gordon Rees Scully & Mansukhani 633 W 5th Street, 52nd Floor Los Angeles, CA 90071 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ When was the debt incurred? 12/4/2018 As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify EJ-1 2018000467142, FILED 12/14/18 OC CLK REC OCSC Case No. 30-2017-00913985 Huntington Beach Gables Homeowners Association; Lee Gragnano, Ted Phillips, Lindy Beck, Janine Jasso, Jennifer Paulin, Lori Burrett	\$46,138.00
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<div style="border: 1px solid black; padding: 2px; display: inline-block;">4.7</div>	Jennifer Ann Paulin c/o Huntington Beach Gables Homeowners Association: Nonpriority Creditor's Name c/o Gordon Rees Scully & Mansukhani 633 W 5th Street, 52nd Floor Los Angeles, CA 90071 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ When was the debt incurred? _____ As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify EJ-1 2018000467142, FILED 12/14/18 OC CLK REC; OCSC Case No. 30-2017-00913985 Huntington Beach Gables Homeowners Association;	\$0.00
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Debtor 1 **Jamie Lynn Gallian**

Main Document Page 527 of 366

Case number (if known) _____

4.8

Lee S Gragnano c/o Huntington Beach**Gables Homeowners Association**Nonpriority Creditor's Name
c/o Gordon Rees Scully & Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Number Street City State Zip Code

Who incurred the debt? Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ Check if this claim is for a community debt**Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number _____

\$0.00**When was the debt incurred?** _____**As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **EJ-1 2018000467142, FILED 12/14/18 OC CLK REC; OCSC Case No. 30-2017-00913985 Huntington Beach Gables Homeowners Association;**

4.9

Lindy Beck c/o Huntington Beach Gables**Homeowners Association**Nonpriority Creditor's Name
c/o Gordon Rees Scully & Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Number Street City State Zip Code

Who incurred the debt? Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ Check if this claim is for a community debt**Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number _____

\$0.00**When was the debt incurred?** _____**As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **EJ-1 2018000467142, FILED 12/14/18 OC CLK REC; OCSC Case No. 30-2017-00913985 Huntington Beach Gables Homeowners Association;**4.1
0**Lisa Ryan**

Nonpriority Creditor's Name

20949 Lassen St. Apt 208
Chattsworth, CA 91311

Number Street City State Zip Code

Who incurred the debt? Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ Check if this claim is for a community debt**Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number _____

\$8,743.02**When was the debt incurred?** **10-18-2018****As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **30-2018-01013582 Misc Debt**

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

4.1
1

**Lori Burrett Huntington Beach Gables
Homeowners Association**

Nonpriority Creditor's Name
**c/o Gordon Rees Scully & Mansukhani
633 W 5th Street, 52nd Floor**

Los Angeles, CA 90071

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another
Check if this claim is for a community
debt

Is the claim subject to offset?

☒ No

☐ Yes

Last 4 digits of account number _____

\$0.00

When was the debt incurred? _____

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not
report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **EJ-1 2018000467142, FILED 12/14/18 OC CLK REC; OCSC Case
No. 30-2017-00913985, Huntington Beach Gables Homeowners Association**

4.1
2

Nationwide Reconveyance, LLC

Nonpriority Creditor's Name

**c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300**

Laguna Hills, CA 92653

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community
debt

Is the claim subject to offset?

☒ No

☐ Yes

Last 4 digits of account number _____

\$0.00

When was the debt incurred? _____

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not
report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Lawsuit - Case No 30-2020-01163055-CU-OR-CJC**

4.1
3

Patricia C. Ryan

Nonpriority Creditor's Name

**20949 Lassen St. Apt 208
Chattsworth, CA 91311**

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community
debt

Is the claim subject to offset?

☒ No

☐ Yes

Last 4 digits of account number _____

Unknown

When was the debt incurred? _____

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not
report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Lawsuit - Houser v Ryan UD**

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

4.1
4

**Rancho Bernard Condominium
Management**

Nonpriority Creditor's Name

**dba Elite Community Management
c/o Gordon Rees Scully Mansukhani
5 Park Plaza Ste 1100
Irvine, CA 92614**

Number Street City State Zip Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim is for a community debt
Is the claim subject to offset?
☒ No
☐ Yes

Last 4 digits of account number _____

\$0.00

When was the debt incurred? _____

As of the date you file, the claim is: Check all that apply

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Lawsuit Case No. 30-2020-01163055**

4.1
5

Randall Nickell

Nonpriority Creditor's Name

**4476 Alderport Dr
Huntington Beach, CA 92649**

Number Street City State Zip Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim is for a community debt
Is the claim subject to offset?
☒ No
☐ Yes

Last 4 digits of account number _____

Unknown

When was the debt incurred? _____

As of the date you file, the claim is: Check all that apply

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Lawsuit - Case No
30-2020-01163055-CU-OR-CJC**

4.1
6

**Orange County Superior Court
Bench Citation (Civil C-33)**

Nonpriority Creditor's Name

**c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653**

Number Street City State Zip Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim is for a community debt
Is the claim subject to offset?
☒ No
☐ Yes

Last 4 digits of account number

17-00913985

\$5,000.00

When was the debt incurred?

7/8/2021

As of the date you file, the claim is: Check all that apply

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **MISC DEBT Collection Case 30-2017-00913985**

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

4.1
7

**People of the State
Of California 18WM05278**

Last 4 digits of account number _____

\$ 13,229.24

Nonpriority Creditor's Name

**West Justice Center
8141 13th Street
Westminster, CA 91683**

When was the debt incurred? _____

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No

☐ Yes

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Misc. Debt - 2021000348287 Filed 05/27/2021; OC Clerk Recorder**

4.1
8

Superior Default Services Inc

Last 4 digits of account number _____

\$0.00

Nonpriority Creditor's Name

**c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653**

When was the debt incurred? _____

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No

☐ Yes

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Lawsuit 30-2020-01163055**

4.1
9

The Huntington Beach Gables

Last 4 digits of account number _____

\$319,653.59

Nonpriority Creditor's Name

**Homeowners Association
c/o Epsten Grinnell & Howell, APC
10200 Willow Creek Road, Ste 100
San Diego, CA 92131**

When was the debt incurred? **5/6/2019**

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No

☐ Yes

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **EJ-001 2019000165259, FILED 05/16/2019 OC CLERK RECORDER; OCSC No. 30-2017-00913985; Huntington Beach Gables Homeowners Association;**

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

<div style="border: 1px solid black; padding: 2px;">4.2 0</div>	The Huntington Beach Gables Nonpriority Creditor's Name Homeowners Association c/o Epsten Grinnell & Howell, APC 10200 Willow Creek Road, Ste 100 San Diego, CA 92131 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ \$9,265.00 When was the debt incurred? <u>March 21, 2019</u> As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify EJ-001 2019000148568, FILED 05/03/2019 OC CLERK RECORDER; OCSC Case No. 30-2017-00962999, Huntington Beach Gables Homeowners Association
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<div style="border: 1px solid black; padding: 2px;">4.2 1</div>	The Huntington Beach Gables Nonpriority Creditor's Name Homeowners Association c/o Epsten Grinnell & Howell APC 10200 Willow Creek Road, Ste 100 San Diego, CA 92131 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ \$3,070.00 When was the debt incurred? <u>September 27, 2018</u> As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify EJ-001 2018000435011, FILED 11/19/2018 OC CLERK RECORDER; OCSC No. 30-2017-00913985, Huntington Beach Gables Homeowners Association
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<div style="border: 1px solid black; padding: 2px;">4.2 2</div>	Ted Phillips c/o Huntington Beach Gables Homeowners Association Nonpriority Creditor's Name c/o Gordon Rees Scully & Mansukhani 633 W 5th Street, 52nd Floor Los Angeles, CA 90071 Number Street City State Zip Code Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ \$0.00 When was the debt incurred? _____ As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify EJ-001 2018000467142, FILED 12/14/2018 OC CLERK RECORDER; OCSC No. 30-2017-00913985, Huntington Beach Gables Homeowners Association
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Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

4.2
3

**The Huntington Beach Gables
Homeowners Association**

Nonpriority Creditor's Name
c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653

Number Street City State Zip Code=

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community
debt

Is the claim subject to offset?

☒ No

☐ Yes

Last 4 digits of account number

Unknown

When was the debt incurred?

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not
report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **OCSC CX Complaint Lawsuit 30-2020-01163055 Filed (11/9/2020)**

Nickel vs. Huntington Beach Gables Homeowners Association

4.2
4

United Airlines

Nonpriority Creditor's Name
PO Box 0675
Carol Stream, IL 60132-0675

Number Street City State Zip Code=

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community
debt

Is the claim subject to offset?

☒ No

☐ Yes

Last 4 digits of account number **10092**

\$9,572.91

When was the debt incurred?

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not
report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Misc Debt COBRA**

4.2
5

US Bank NA

Nonpriority Creditor's Name
PO Box 64799
Saint Paul, MN 55164

Number Street City State Zip Code

Who incurred the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community
debt

Is the claim subject to offset?

☒ No

☐ Yes

Last 4 digits of account number **6482**

\$9,145.00

When was the debt incurred?

As of the date you file, the claim is: Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans

☐ Obligations arising out of a separation agreement or divorce that you did not
report as priority claims

☐ Debts to pension or profit-sharing plans, and other similar debts

☒ Other. Specify **Collection**

Part 3: List Others to Be Notified About a Debt That You Already Listed

5. Use this page only if you have others to be notified about your bankruptcy, for a debt that you already listed in Parts 1 or 2. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the original creditor in Parts 1 or 2, then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Parts 1 or 2, list the additional creditors here. If you do not have additional persons to be notified for any debts in Parts 1 or 2, do not fill out or submit this page.

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Name and Address
Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.23** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Name and Address
Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.12** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Name and Address
Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.18** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Name and Address
Gorden G May
Grant, Genovese & Baratta, LLP
2030 Main Street, Ste. 1600
irvine, CA 92614

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.1** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Name and Address
Gordon Rees Scully & Mansukhani
5 Park Plaza Ste. 1100
Irvine, CA 92614

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.14** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Name and Address
Gordon Rees Scully & Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.2** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

4.6; 4.7; 4.8; 4.9; 4.11; 4.22

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Name and Address
Mark Mellor
Mellor Law Firm
6800 Indiana Avenue Ste. 220
Riverside, CA 92506

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.15** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Name and Address
Vivian J. Alston
Alston, Alston, & Diebold
27201 Puerta Real, Ste. 300
Mission Viejo, CA 92691

On which entry in Part 1 or Part 2 did you list the original creditor?

Line **4.3** of (Check one):

☐ Part 1: Creditors with Priority Unsecured Claims

☒ Part 2: Creditors with Nonpriority Unsecured Claims

Last 4 digits of account number

Part 4: Add the Amounts for Each Type of Unsecured Claim

6. Total the amounts of certain types of unsecured claims. This information is for statistical reporting purposes only. 28 U.S.C. §159. Add the amounts for each type of unsecured claim.

		Total Claim	
Total claims from Part 1	6a. Domestic support obligations	6a. \$	<u>0.00</u>
	6b. Taxes and certain other debts you owe the government	6b. \$	<u>0.00</u>
	6c. Claims for death or personal injury while you were intoxicated	6c. \$	<u>0.00</u>
	6d. Other. Add all other priority unsecured claims. Write that amount here.	6d. \$	<u>0.00</u>
	6e. Total Priority. Add lines 6a through 6d.	6e. \$	<u>0.00</u>
Total claims from Part 2		Total Claim	
	6f. Student loans	6f. \$	<u>0.00</u>
	6g. Obligations arising out of a separation agreement or divorce that you did not report as priority claims	6g. \$	<u>0.00</u>
	6h. Debts to pension or profit-sharing plans, and other similar debts	6h. \$	<u>0.00</u>

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

6i. **Other.** Add all other nonpriority unsecured claims. Write that amount here.

6i. \$ 427,177.76

6j. **Total Nonpriority.** Add lines 6f through 6i.

6j. \$ 427,177.76

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106G

Schedule G: Executory Contracts and Unexpired Leases

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the additional page, fill it out, number the entries, and attach it to this page. On the top of any additional pages, write your name and case number (if known).

1. Do you have any executory contracts or unexpired leases?

- ☒ No. Check this box and file this form with the court with your other schedules. You have nothing else to report on this form.
☐ Yes. Fill in all of the information below even if the contacts of leases are listed on *Schedule A/B: Property* (Official Form 106 A/B).

2. List separately each person or company with whom you have the contract or lease. Then state what each contract or lease is for (for example, rent, vehicle lease, cell phone). See the instructions for this form in the instruction booklet for more examples of executory contracts and unexpired leases.

	Person or company with whom you have the contract or lease Name, Number, Street, City, State and ZIP Code	State what the contract or lease is for
2.1	Kia Motors Name P.O. Box 20815 Number Street Fountain Valley, CA 92708 City State ZIP Code	Kia Sportage Car Lease
2.2	Robert P. Warmington Co Name 3090 Pullman St. Number Street Costa Mesa, CA 92626 City State ZIP Code	Unexpired Ground Leasehold Located on APN 178-011-01, Unit 4, Tract 10542, Space 376. Expires 12/31/2059
2.3	BS Investors, LP Name 18201 Von Karman Ste. 450 Number Street Irvine, CA 92612 City State ZIP Code	Unexpired Ground Leasehold Located on APN 178-011-01. Unit 4, Tract 10542, Space 376. Expires 12/31/2059
2.4	Houser Bros Co dba Rancho Del Rey Mobilehome Estates Name 16222 Monterey Ln Number Street Huntington Beach CA 92649 City State ZIP Code	Unexpired Ground Leasehold, Located on APN 178-011-01. Unit 4, Tract 10542, Space 376. Expires 12/31/2059
2.5	 Name Number Street City State ZIP Code	

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106H Schedule H: Your Codebtors

12/15

Codebtors are people or entities who are also liable for any debts you may have. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, and number the entries in the boxes on the left. Attach the Additional Page to this page. On the top of any Additional Pages, write your name and case number (if known). Answer every question.

1. Do you have any codebtors? (If you are filing a joint case, do not list either spouse as a codebtor.)

- ☒ No
☐ Yes

2. Within the last 8 years, have you lived in a community property state or territory? (Community property states and territories include Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, and Wisconsin.)

- ☐ No. Go to line 3.
☒ Yes. Did your spouse, former spouse, or legal equivalent live with you at the time?

- ☒ No
☐ Yes.

In which community state or territory did you live? -NONE-. Fill in the name and current address of that person.

Name of your spouse, former spouse, or legal equivalent
Number, Street, City, State & Zip Code

3. In Column 1, list all of your codebtors. Do not include your spouse as a codebtor if your spouse is filing with you. List the person shown in line 2 again as a codebtor only if that person is a guarantor or cosigner. Make sure you have listed the creditor on Schedule D (Official Form 106D), Schedule E/F (Official Form 106E/F), or Schedule G (Official Form 106G). Use Schedule D, Schedule E/F, or Schedule G to fill out Column 2.

Column 1: Your codebtor

Name, Number, Street, City, State and ZIP Code

Column 2: The creditor to whom you owe the debt
Check all schedules that apply:

3.1

Name _____
Number Street State ZIP Code
City

- ☐ Schedule D, line _____
☐ Schedule E/F, line _____
☐ Schedule G, line _____

3.2

Name _____
Number Street State ZIP Code
City

- ☐ Schedule D, line _____
☐ Schedule E/F, line _____
☐ Schedule G, line _____

Fill in this information to identify your case:

Debtor 1 Jamie Lynn Gallian

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA

Case number
(If known)

Check if this is:

- ☐ An amended filing
☐ A supplement showing postpetition chapter 13 income as of the following date:

MM / DD / YYYY

Official Form 106I

Schedule I: Your Income

12/15

Be as complete and accurate as possible. If two married people are filing together (Debtor 1 and Debtor 2), both are equally responsible for supplying correct information. If you are married and not filing jointly, and your spouse is living with you, include information about your spouse. If you are separated and your spouse is not filing with you, do not include information about your spouse. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Employment

1. Fill in your employment information.

If you have more than one job, attach a separate page with information about additional employers.

Include part-time, seasonal, or self-employed work.

Occupation may include student or homemaker, if it applies.

Employment status

Occupation

Employer's name

Employer's address

Debtor 1

☐ Employed

☒ Not employed

Unemployed/Disabled; date of injury 8/5/2018, severe crushing injury left foot, with nerve impingement, protruding interior bone left interior portion foot.

Flight Attendant-United Airlines

How long employed there? 22 years Last day: worked 10/26/2018

Debtor 2 or non-filing spouse

☐ Employed

☐ Not employed

Part 2: Give Details About Monthly Income

Estimate monthly income as of the date you file this form. If you have nothing to report for any line, write \$0 in the space. Include your non-filing spouse unless you are separated.

If you or your non-filing spouse have more than one employer, combine the information for all employers for that person on the lines below. If you need more space, attach a separate sheet to this form.

	For Debtor 1	For Debtor 2 or non-filing spouse
2. List monthly gross wages, salary, and commissions (before all payroll deductions). If not paid monthly, calculate what the monthly wage would be.	2. \$ 0.00	\$ N/A
3. Estimate and list monthly overtime pay.	3. +\$ 0.00	+\$ N/A
4. Calculate gross income. Add line 2 + line 3.	4. \$ 0.00	\$ N/A

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

	For Debtor 1	For Debtor 2 or non-filing spouse	
Copy line 4 here	4. \$ 0.00	\$ N/A	
5. List all payroll deductions:			
5a. Tax, Medicare, and Social Security deductions	5a. \$ 0.00	\$ N/A	
5b. Mandatory contributions for retirement plans	5b. \$ 0.00	\$ N/A	
5c. Voluntary contributions for retirement plans	5c. \$ 0.00	\$ N/A	
5d. Required repayments of retirement fund loans	5d. \$ 0.00	\$ N/A	
5e. Insurance	5e. \$ 0.00	\$ N/A	
5f. Domestic support obligations	5f. \$ 0.00	\$ N/A	
5g. Union dues	5g. \$ 0.00	\$ N/A	
5h. Other deductions. Specify: _____	5h. + \$ 0.00	+ \$ N/A	
6. Add the payroll deductions. Add lines 5a+5b+5c+5d+5e+5f+5g+5h.	6. \$ 0.00	\$ N/A	
7. Calculate total monthly take-home pay. Subtract line 6 from line 4.	7. \$ 0.00	\$ N/A	
8. List all other income regularly received:			
8a. Net income from rental property and from operating a business, profession, or farm Attach a statement for each property and business showing gross receipts, ordinary and necessary business expenses, and the total monthly net income.	8a. \$ 1,000.00	\$ N/A	
8b. Interest and dividends	8b. \$ 0.00	\$ N/A	
8c. Family support payments that you, a non-filing spouse, or a dependent regularly receive Include alimony, spousal support, child support, maintenance, divorce settlement, and property settlement.	8c. \$ 0.00	\$ N/A	
8d. Unemployment compensation	8d. \$ 0.00	\$ N/A	
8e. Social Security	8e. \$ 0.00	\$ N/A	
8f. Other government assistance that you regularly receive Include cash assistance and the value (if known) of any non-cash assistance that you receive, such as food stamps (benefits under the Supplemental Nutrition Assistance Program) or housing subsidies. Specify: _____	8f. \$ 0.00	\$ N/A	
8g. Pension or retirement income	8g. \$ 0.00	\$ N/A	
8h. Other monthly income. Specify: _____	8h. + \$ 0.00	+ \$ N/A	
9. Add all other income. Add lines 8a+8b+8c+8d+8e+8f+8g+8h.	9. \$ 1,000.00	\$ N/A	
10. Calculate monthly income. Add line 7 + line 9. Add the entries in line 10 for Debtor 1 and Debtor 2 or non-filing spouse.	10. \$ 1,000.00	+ \$ N/A	= \$ 1,000.00
11. State all other regular contributions to the expenses that you list in Schedule J. Include contributions from an unmarried partner, members of your household, your dependents, your roommates, and other friends or relatives. Do not include any amounts already included in lines 2-10 or amounts that are not available to pay expenses listed in Schedule J. Specify: _____		11. +\$ 0.00	
12. Add the amount in the last column of line 10 to the amount in line 11. The result is the combined monthly income. Write that amount on the <i>Summary of Schedules and Statistical Summary of Certain Liabilities and Related Data</i> , if it applies		12. \$ 1,000.00	Combined monthly income
13. Do you expect an increase or decrease within the year after you file this form?			
<input checked="" type="checkbox"/> No.			
<input type="checkbox"/> Yes. Explain: _____			

Fill in this information to identify your case:

Debtor 1 Jamie Lynn Gallian

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA

Case number _____
(If known)

Check if this is:

- ☐ An amended filing
- ☐ A supplement showing postpetition chapter 13 expenses as of the following date:

____ / ____ / ____

MM / DD / YYYY

Official Form 106J

Schedule J: Your Expenses

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach another sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Your Household

1. Is this a joint case?

☒ No. Go to line 2.

☐ Yes. Does Debtor 2 live in a separate household?

☐ No

☐ Yes. Debtor 2 must file Official Form 106J-2, *Expenses for Separate Household* of Debtor 2.

2. Do you have dependents? ☒ No

Do not list Debtor 1 and Debtor 2.

☐ Yes. Fill out this information for each dependent.....

Dependent's relationship to Debtor 1 or Debtor 2

Dependent's age

Does dependent live with you?

Do not state the dependents names.

☐ No

☐ Yes

☐ No

☐ Yes

☐ No

☐ Yes

☐ No

☐ Yes

3. Do your expenses include expenses of people other than yourself and your dependents? ☒ No ☐ Yes

Part 2: Estimate Your Ongoing Monthly Expenses

Estimate your expenses as of your bankruptcy filing date unless you are using this form as a supplement in a Chapter 13 case to report expenses as of a date after the bankruptcy is filed. If this is a supplemental *Schedule J*, check the box at the top of the form and fill in the applicable date.

Include expenses paid for with non-cash government assistance if you know the value of such assistance and have included it on *Schedule I: Your Income* (Official Form 106I.)

Your expenses

4. The rental or home ownership expenses for your residence. Include first mortgage payments and any rent for the ground or lot.

4. \$ 0.00

If not included in line 4:

4a. Real estate taxes

4a. \$ 100.00

4b. Property, homeowner's, or renter's insurance

4b. \$ 100.00

4c. Home maintenance, repair, and upkeep expenses

4c. \$ 100.00

4d. Homeowner's association or condominium dues

4d. \$ 0.00

5. Additional mortgage payments for your residence, such as home equity loans

5. \$ 100.00

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

6. Utilities:

6a. Electricity, heat, natural gas	6a. \$	200.00
6b. Water, sewer, garbage collection	6b. \$	60.00
6c. Telephone, cell phone, Internet, satellite, and cable services	6c. \$	160.00
6d. Other. Specify: Space #376 Rent	6d. \$	1,086.00

7. Food and housekeeping supplies

7. \$ **500.00**

8. Childcare and children's education costs

8. \$ **0.00**

9. Clothing, laundry, and dry cleaning

9. \$ **0.00**

10. Personal care products and services

10. \$ **30.00**

11. Medical and dental expenses

11. \$ **125.00**

12. Transportation. Include gas, maintenance, bus or train fare.
Do not include car payments.

12. \$ **100.00**

13. Entertainment, clubs, recreation, newspapers, magazines, and books

13. \$ **0.00**

14. Charitable contributions and religious donations

14. \$ **0.00**

15. Insurance.

Do not include insurance deducted from your pay or included in lines 4 or 20.

15a. Life insurance	15a. \$	0.00
15b. Health insurance	15b. \$	0.00
15c. Vehicle insurance	15c. \$	175.00
15d. Other insurance. Specify:	15d. \$	0.00

16. Taxes. Do not include taxes deducted from your pay or included in lines 4 or 20.
Specify:

16. \$ **0.00**

17. Installment or lease payments:

17a. Car payments for Vehicle 1	17a. \$	240.00
17b. Car payments for Vehicle 2	17b. \$	0.00
17c. Other. Specify:	17c. \$	0.00
17d. Other. Specify:	17d. \$	0.00

18. Your payments of alimony, maintenance, and support that you did not report as deducted from your pay on line 5, Schedule I, Your Income (Official Form 106I).

18. \$ **0.00**

19. Other payments you make to support others who do not live with you.

\$ **0.00**

Specify:

20. Other real property expenses not included in lines 4 or 5 of this form or on Schedule I: Your Income.

20a. Mortgages on other property	20a. \$	0.00
20b. Real estate taxes	20b. \$	0.00
20c. Property, homeowner's, or renter's insurance	20c. \$	0.00
20d. Maintenance, repair, and upkeep expenses	20d. \$	0.00
20e. Homeowner's association or condominium dues	20e. \$	0.00

21. Other: Specify:

21. +\$ **0.00**

22. Calculate your monthly expenses

22a. Add lines 4 through 21.

22b. Copy line 22 (monthly expenses for Debtor 2), if any, from Official Form 106J-2=

22c. Add line 22a and 22b. The result is your monthly expenses.

\$	2,676.00
\$	
\$	2,676.00

23. Calculate your monthly net income.

23a.= Copy line 12 (your combined monthly income) from Schedule I.

23a. \$ **1,000.00**

23b.= Copy your monthly expenses from line 22c above.

23b. -\$ **2,676.00**

23c. Subtract your monthly expenses from your monthly income.
The result is your *monthly net income*.

23c. \$ **-1,676.00**

24. Do you expect an increase or decrease in your expenses within the year after you file this form?

For example, do you expect to finish paying for your car loan within the year or do you expect your mortgage payment to increase or decrease because of a modification to the terms of your mortgage?

☒ No.

☐ Yes.

Explain here:

Fill in this information to identify your case:

Debtor 1 Jamie Lynn Gallian
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA

Case number _____
(if known)

☐ Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

☒ No

☐ Yes. Name of person _____

Attach *Bankruptcy Petition Preparer's Notice, Declaration, and Signature* (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X

Jamie Lynn Gallian
Signature of Debtor 1

Date

7/9/2021

X

Signature of Debtor 2

Date

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

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Best Case Bankruptcy

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 107 Statement of Financial Affairs for Individuals Filing for Bankruptcy

4/19

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Give Details About Your Marital Status and Where You Lived Before

1. What is your current marital status?

- ☐ Married
☒ Not married

2. During the last 3 years, have you lived anywhere other than where you live now?

- ☒ No
☐ Yes. List all of the places you lived in the last 3 years. Do not include where you live now.

Debtor 1 Prior Address:

Dates Debtor 1
lived there

Debtor 2 Prior Address:

Dates Debtor 2
lived there

3. Within the last 8 years, did you ever live with a spouse or legal equivalent in a community property state or territory? (Community property states and territories include Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington and Wisconsin.)

- ☒ No
☐ Yes. Make sure you fill out *Schedule H: Your Creditors* (Official Form 106H).

Part 2: Explain the Sources of Your Income

4. Did you have any income from employment or from operating a business during this year or the two previous calendar years?

Fill in the total amount of income you received from all jobs and all businesses, including part-time activities. If you are filing a joint case and you have income that you receive together, list it only once under Debtor 1.

- ☐ No
☒ Yes. Fill in the details.

	Debtor 1		Debtor 2
	Sources of income Check all that apply.	Gross income (before deductions and exclusions)	Sources of income Check all that apply.
			Gross income (before deductions and exclusions)
For last calendar year: (January 1 to December 31, 2020)	<input checked="" type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business	\$1,408.00	<input type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

	Debtor 1		Debtor 2
	Sources of income Check all that apply.	Gross income (before deductions and exclusions)	Sources of income Check all that apply.
			Gross income (before deductions and exclusions)
For the calendar year before that: (January 1 to December 31, 2019)	<input checked="" type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business	\$3,375.00	<input type="checkbox"/> Wages, commissions, bonuses, tips <input type="checkbox"/> Operating a business

5. Did you receive any other income during this year or the two previous calendar years?

Include income regardless of whether that income is taxable. Examples of *other income* are alimony; child support; Social Security, unemployment, and other public benefit payments; pensions; rental income; interest; dividends; money collected from lawsuits; royalties; and gambling and lottery winnings. If you are filing a joint case and you have income that you received together, list it only once under Debtor 1.

List each source and the gross income from each source separately. Do not include income that you listed in line 4.

- ☐ No
☒ Yes. Fill in the details.

	Debtor 1		Debtor 2
	Sources of income Describe below.	Gross income from each source (before deductions and exclusions)	Sources of income Describe below.
			Gross income (before deductions and exclusions)
From January 1 of current year until the date you filed for bankruptcy:	Unemployment	\$0.00	
For last calendar year: (January 1 to December 31, 2020)	Unemployment	\$21,227.00	
	Retirement	\$31,922.58	

Part 3: List Certain Payments You Made Before You Filed for Bankruptcy

6. Are either Debtor 1's or Debtor 2's debts primarily consumer debts?

- ☐ No. **Neither Debtor 1 nor Debtor 2 has primarily consumer debts.** *Consumer debts* are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose."

During the 90 days before you filed for bankruptcy, did you pay any creditor a total of \$6,825* or more?

- ☐ No. Go to line 7.
☐ Yes List below each creditor to whom you paid a total of \$6,825* or more in one or more payments and the total amount you paid that creditor. Do not include payments for domestic support obligations, such as child support and alimony. Also, do not include payments to an attorney for this bankruptcy case.

* Subject to adjustment on 4/01/22 and every 3 years after that for cases filed on or after the date of adjustment.

- ☒ Yes. **Debtor 1 or Debtor 2 or both have primarily consumer debts.**
 During the 90 days before you filed for bankruptcy, did you pay any creditor a total of \$600 or more?

- ☒ No. Go to line 7.
☐ Yes List below each creditor to whom you paid a total of \$600 or more and the total amount you paid that creditor. Do not include payments for domestic support obligations, such as child support and alimony. Also, do not include payments to an attorney for this bankruptcy case.

Creditor's Name and Address	Dates of payment	Total amount paid	Amount you still owe	Was this payment for ...
-----------------------------	------------------	-------------------	----------------------	--------------------------

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

7. **Within 1 year before you filed for bankruptcy, did you make a payment on a debt you owed anyone who was an insider?**
Insiders include your relatives; any general partners; relatives of any general partners; partnerships of which you are a general partner; corporations of which you are an officer, director, person in control, or owner of 20% or more of their voting securities; and any managing agent, including one for a business you operate as a sole proprietor. 11 U.S.C. § 101. Include payments for domestic support obligations, such as child support and alimony.

- ☒ No
☐ Yes. List all payments to an insider.

Insider's Name and Address	Dates of payment	Total amount paid	Amount you still owe	Reason for this payment
----------------------------	------------------	-------------------	----------------------	-------------------------

8. **Within 1 year before you filed for bankruptcy, did you make any payments or transfer any property on account of a debt that benefited an insider?**
 Include payments on debts guaranteed or cosigned by an insider.

- ☒ No
☐ Yes. List all payments to an insider

Insider's Name and Address	Dates of payment	Total amount paid	Amount you still owe	Reason for this payment Include creditor's name
----------------------------	------------------	-------------------	----------------------	--

Part 4: Identify Legal Actions, Repossessions, and Foreclosures

9. **Within 1 year before you filed for bankruptcy, were you a party in any lawsuit, court action, or administrative proceeding?**
 List all such matters, including personal injury cases, small claims actions, divorces, collection suits, paternity actions, support or custody modifications, and contract disputes.

- ☐ No
☒ Yes. Fill in the details.

Case title Case number Filed	Nature of the case	Court or agency	Status of the case
1/2/2019 Houser Bros Co v Jamie Gallian 30-2019-01041423-CI-UD-CJC	Unlawful Detainer	Orange County Superior Court 700 W Civic Center West Santa Ana, CA 92701	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
11/8/2020 Randall L Nickell v. The Huntington Beach Gables HOA, et al 30-2020-01163055-CU-OR-CJC	Civil	Orange County Superior Court 700 Civic Center Drive West Santa Ana, CA 92701	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
4/11/2017 Huntington Beach Gables Homeowners Association vs. Sandra Bradley et al. 30-2017-00913985-CU-CO-CJC	Collections	Orange County Superior Court 700 Civic Center Drive West Santa Ana, CA 92701	<input type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
12/22/2017 Huntington Beach Gables Homeowners Association vs. Jamie Lynn Gallian 30-2017-00962999-CU-HR-CJC	Collections	Orange County Superior Court 700 Civic Center Drive West Santa Ana, CA 92701	<input type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded

☐ Pending
☐ On appeal
☐ Concluded

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

10. Within 1 year before you filed for bankruptcy, was any of your property repossessed, foreclosed, garnished, attached, seized, or levied? Check all that apply and fill in the details below.

A WRIT dated 11/19/18, in the name of LISA T. RYAN, Case No. 30-2018-01013582 was UNLAWFULLY executed by Park

- ☒ No. Go to line 11. Mgr., Houser Bros Co GP on 3/4/2019, against the bona fide purchase of Ryan home LBM1081 on 11/1/2018.
☐ Yes. Fill in the information below. - Possession returned to bona fide buyer by Judicial Officer Judge Carmen Luege. on 3/6/19, OCJC.

Creditor Name and Address	Describe the Property	Date	Value of the property
Houser Bros Co GP dba RDRMHE	LBM 1081 Explain what happened	3/6/2019	Resident Gallian was removed from her home by force on 3/4/19, Park Manager changed Locks unlawfully. Possession ret. to Gallian.

11. Within 90 days before you filed for bankruptcy, did any creditor, including a bank or financial institution, set off any amounts from your accounts or refuse to make a payment because you owed a debt?

- ☒ No
☐ Yes. Fill in the details.

Creditor Name and Address	Describe the action the creditor took	Date action was taken	Amount
---------------------------	---------------------------------------	-----------------------	--------

12. Within 1 year before you filed for bankruptcy, was any of your property in the possession of an assignee for the benefit of creditors, a court-appointed receiver, a custodian, or another official?

- ☒ No
☐ Yes

Part 5: List Certain Gifts and Contributions

13. Within 2 years before you filed for bankruptcy, did you give any gifts with a total value of more than \$600 per person?

- ☒ No
☐ Yes. Fill in the details for each gift.

Gifts with a total value of more than \$600 per person	Describe the gifts	Dates you gave the gifts	Value
Person to Whom You Gave the Gift and Address:			

14. Within 2 years before you filed for bankruptcy, did you give any gifts or contributions with a total value of more than \$600 to any charity?

- ☒ No
☐ Yes. Fill in the details for each gift or contribution.

Gifts or contributions to charities that total more than \$600	Describe what you contributed	Dates you contributed	Value
Charity's Name Address (Number, Street, City, State and ZIP Code)			

Part 6: List Certain Losses

15. Within 1 year before you filed for bankruptcy or since you filed for bankruptcy, did you lose anything because of theft, fire, other disaster, or gambling?

Unemployment due to Covid 19 pandemic massive layoffs in airline industry and other industries; California Governors Stay at Home Orders. Unable to procure sustainable employment. Apply for Covid 19 Rent Relief State Programs.

- No
☒ Yes. Fill in the details.

Describe the property you lost and how the loss occurred	Describe any insurance coverage for the loss	Date of your loss	Value of property lost
	Include the amount that insurance has paid. List pending insurance claims on line 33 of <i>Schedule A/B: Property</i> .		

Part 7: List Certain Payments or Transfers

16. Within 1 year before you filed for bankruptcy, did you or anyone else acting on your behalf pay or transfer any property to anyone you consulted about seeking bankruptcy or preparing a bankruptcy petition?

Include any attorneys, bankruptcy petition preparers, or credit counseling agencies for services required in your bankruptcy.

- ☐ No
☒ Yes. Fill in the details.

Person Who Was Paid Address Email or website address Person Who Made the Payment, if Not You	Description and value of any property transferred	Date payment or transfer was made	Amount of payment
---	---	-----------------------------------	-------------------

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Person Who Was Paid; Address; Email address	Description and value of any property transferred	Date payment or transfer was made	Amount of payment
James H. Casello Esq. SBN 76021	Client Trust Account for Atty Fees	2019-2020	\$ 43,000.00
Michael Chulak, Esq. SBN 194744 (suspended)	Client Trust Account for Atty Fees	2018-2019	\$ 8,700.00
Michael S. Devereux, Esq. SBN 225240	Client Trust Account for Atty Fees	2018-2019	\$ 5,000.00
Steven A. Fink, Esq. SBN 93762	Client Trust Account for Atty Fees	2019-2020	\$ 30,000.00
David R. Flyer, Esq. SBN 10069	Client Trust Account for Atty Fees	2018-2019	\$ 17,000.00
Raquel Flyer-Dashner Esq. SBN 282248	Client Trust Account for Atty Fees	2018	\$ 5,000.00
Frank A. Satalino, Esq. SBN 143444	Client Trust Account for Atty Fees	2018	\$ 5,000.00
TOTAL			\$ 113,700.00

17. Within 1 year before you filed for bankruptcy, did you or anyone else acting on your behalf pay or transfer any property to anyone who promised to help you deal with your creditors or to make payments to your creditors?
Do not include any payment or transfer that you listed on line 16.

- ☒ No
☐ Yes. Fill in the details.

Person Who Was Paid Address	Description and value of any property transferred	Date payment or transfer was made	Amount of payment
--------------------------------	---	-----------------------------------	-------------------

18. Within 2 years before you filed for bankruptcy, did you sell, trade, or otherwise transfer any property to anyone, other than property transferred in the ordinary course of your business or financial affairs?
Include both outright transfers and transfers made as security (such as the granting of a security interest or mortgage on your property). Do not include gifts and transfers that you have already listed on this statement.

- ☐ No
☒ Yes. Fill in the details.

Person Who Received Transfer Address	Description and value of property transferred	Describe any property or payments received or debts paid in exchange	Date transfer was made
Person's relationship to you Randall Nickell 4476 Alderport Dr. Unit 53 Huntington Beach, CA 92649 Bona fide purchaser for Value.	Primary residence sold Leasehold on 10/31/2018 4476 Alderport Drive #53, Huntington Beach, CA 92649 APN 937-63-053	\$379,000	10/31/2018

19. Within 10 years before you filed for bankruptcy, did you transfer any property to a self-settled trust or similar device of which you are a beneficiary? (These are often called *asset-protection devices*.)

- ☒ No
☐ Yes. Fill in the details.

Name of trust	Description and value of the property transferred	Date Transfer was made
---------------	---	------------------------

Part 8: List of Certain Financial Accounts, Instruments, Safe Deposit Boxes, and Storage Units

20. Within 1 year before you filed for bankruptcy, were any financial accounts or instruments held in your name, or for your benefit, closed, sold, moved, or transferred?
Include checking, savings, money market, or other financial accounts; certificates of deposit; shares in banks, credit unions, brokerage houses, pension funds, cooperatives, associations, and other financial institutions.

- ☒ No
☐ Yes. Fill in the details.

Name of Financial Institution and Address (Number, Street, City, State and ZIP Code)	Last 4 digits of account number	Type of account or instrument	Date account was closed, sold, moved, or transferred	Last balance before closing or transfer
--	---------------------------------	-------------------------------	--	---

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

21. Do you now have, or did you have within 1 year before you filed for bankruptcy, any safe deposit box or other depository for securities, cash, or other valuables?

- ☐ No
☐ Yes. Fill in the details.

Name of Financial Institution	Who else had access to it?	Describe the contents	Do you still have it?
Address (Number, Street, City, State and ZIP Code)	Address (Number, Street, City, State and ZIP Code)		

22. Have you stored property in a storage unit or place other than your home within 1 year before you filed for bankruptcy?

- ☐ No
☐ Yes. Fill in the details.

Name of Storage Facility	Who else has or had access to it?	Describe the contents	Do you still have it?
Address (Number, Street, City, State and ZIP Code)	Address (Number, Street, City, State and ZIP Code)		

Part 9: Identify Property You Hold or Control for Someone Else

23. Do you hold or control any property that someone else owns? Include any property you borrowed from, are storing for, or hold in trust for someone.

- ☐ No
☐ Yes. Fill in the details.

Owner's Name	Where is the property?	Describe the property	Value
Address (Number, Street, City, State and ZIP Code)	(Number, Street, City, State and ZIP Code)		

Part 10: Give Details About Environmental Information

For the purpose of Part 10, the following definitions apply:

- ☐ **Environmental law** means any federal, state, or local statute or regulation concerning pollution, contamination, releases of hazardous or toxic substances, wastes, or material into the air, land, soil, surface water, groundwater, or other medium, including statutes or regulations controlling the cleanup of these substances, wastes, or material.
- ☐ **Site** means any location, facility, or property as defined under any environmental law, whether you now own, operate, or utilize it or used to own, operate, or utilize it, including disposal sites.
- ☐ **Hazardous material** means anything an environmental law defines as a hazardous waste, hazardous substance, toxic substance, hazardous material, pollutant, contaminant, or similar term.

Report all notices, releases, and proceedings that you know about, regardless of when they occurred.

24. Has any governmental unit notified you that you may be liable or potentially liable under or in violation of an environmental law?

- ☐ No
☐ Yes. Fill in the details.

Name of site	Governmental unit	Environmental law, if you know it	Date of notice
Address (Number, Street, City, State and ZIP Code)	Address (Number, Street, City, State and ZIP Code)		

25. Have you notified any governmental unit of any release of hazardous material?

- ☐ No
☐ Yes. Fill in the details.

Name of site	Governmental unit	Environmental law, if you know it	Date of notice
Address (Number, Street, City, State and ZIP Code)	Address (Number, Street, City, State and ZIP Code)		

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

26. Have you been a party in any judicial or administrative proceeding under any environmental law? Include settlements and orders.

- ☒ No
☐ Yes. Fill in the details.

Case Title Case Number	Court or agency Name Address (Number, Street, City, State and ZIP Code)	Nature of the case	Status of the case
---------------------------	--	--------------------	--------------------

Part 11: Give Details About Your Business or Connections to Any Business

27. Within 4 years before you filed for bankruptcy, did you own a business or have any of the following connections to any business?

- ☐ A sole proprietor or self-employed in a trade, profession, or other activity, either full-time or part-time
☒ A member of a limited liability company (LLC) or limited liability partnership (LLP)
☐ A partner in a partnership
☐ An officer, director, or managing executive of a corporation
☐ An owner of at least 5% of the voting or equity securities of a corporation

☐ No. None of the above applies. Go to Part 12.

☒ Yes. Check all that apply above and fill in the details below for each business.

Business Name Address (Number, Street, City, State and ZIP Code)	Describe the nature of the business Name of accountant or bookkeeper	Employer Identification number Do not include Social Security number or ITIN. Dates business existed
J-Sandcastle Co., LLC 16222 Monterey Lane #376 Huntington Beach, CA 92649	Residential Management	EIN: 83-2453659 From-To 10/19/2018 - Present
J-Pad, LLC 16222 Monterey Lane #376 Huntington Beach, CA 92649	Residential Management	EIN: From-To 02/09/2018 - Present

28. Within 2 years before you filed for bankruptcy, did you give a financial statement to anyone about your business? Include all financial institutions, creditors, or other parties.

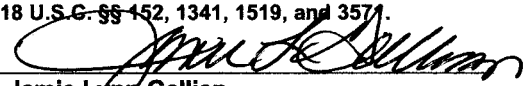
- ☒ No
☐ Yes. Fill in the details below.

Name Address (Number, Street, City, State and ZIP Code)	Date Issued
---	-------------

Part 12: Sign Below

I have read the answers on this *Statement of Financial Affairs* and any attachments, and I declare under penalty of perjury that the answers are true and correct. I understand that making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both.

18 U.S.C. §§ 152, 1341, 1519, and 3571.


Jamie Lynn Gallian
Signature of Debtor 1

Signature of Debtor 2

Date 7/9/2021

Date _____

Did you attach additional pages to *Your Statement of Financial Affairs for Individuals Filing for Bankruptcy* (Official Form 107)?

- ☒ No
☐ Yes

Did you pay or agree to pay someone who is not an attorney to help you fill out bankruptcy forms?

- ☒ No

Debtor 1 Jamie Lynn Gallian Case number (if known) _____

☐ Yes. Name of Person _____. Attach the *Bankruptcy Petition Preparer's Notice, Declaration, and Signature* (Official Form 119).

Fill in this information to identify your case:

Debtor 1 Jamie Lynn Gallian
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA

Case number
(if known) _____

☐ Check if this is an amended filing

Official Form 108 Statement of Intention for Individuals Filing Under Chapter 7

12/15

If you are an individual filing under chapter 7, you must fill out this form if:

- ☒ creditors have claims secured by your property, or
- ☒ you have leased personal property and the lease has not expired.

You must file this form with the court within 30 days after you file your bankruptcy petition or by the date set for the meeting of creditors, whichever is earlier, unless the court extends the time for cause. You must also send copies to the creditors and lessors you list on the form

If two married people are filing together in a joint case, both are equally responsible for supplying correct information. Both debtors must sign and date the form.

Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known).

Part 1: List Your Creditors Who Have Secured Claims

1. For any creditors that you listed in Part 1 of Schedule D: Creditors Who Have Claims Secured by Property (Official Form 106D), fill in the information below.

Identify the creditor and the property that is collateral	What do you intend to do with the property that secures a debt?	Did you claim the property as exempt on Schedule C?
Creditor's name: Houser Bros. Co. dba Rancho Del Rey Mobile-home Estates Space #376, Unexpired Ground leasehold until 2059, located on APN 178-011-16; Parcel Map Book 108, Pg. 47 & 48, County of Orange property Description of securing debt: 16222 Monterey Ln. Space #376 Huntington Beach, CA 92649 Orange County. APN 891-569-62 Decal No. LBM1081 Title held by Debtor's single member LLC J-Sandcastle Co, LLC	<input type="checkbox"/> Surrender the property. <input type="checkbox"/> Retain the property and redeem it. <input checked="" type="checkbox"/> Retain the property and enter into a <i>Reaffirmation Agreement</i> . <input checked="" type="checkbox"/> Retain the property and [explain]: Debtor will retain collateral & continue to make Monthly Ground Space Payments #376, located on APN 178-011-16	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes
Creditor's name: J-Pad, LLC Description of property securing debt: 16222 Monterey Ln. Space #376 Huntington Beach, CA 92649 Orange County. APN-891-569-62, Decal No. LBM1081 Title held by Debtor's single member LLC J-Sandcastle Co, LLC	<input type="checkbox"/> Surrender the property. <input type="checkbox"/> Retain the property and redeem it. <input type="checkbox"/> Retain the property and enter into a <i>Reaffirmation Agreement</i> . <input checked="" type="checkbox"/> Retain the property and [explain]: Debtor will retain collateral & continue to make regular principal payments.	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Creditor's name: **Kia Motors Finance**

No

Description of property securing debt: **2020 Kia Sportage
Location: 16222 Monterey Ln #376,
Huntington Beach CA 92649
(LEASE)**

- ☐ Retain the property and redeem it.
☒ Retain the property and enter into a
Reaffirmation Agreement.
☐ Retain the property and [explain]:

☒ Yes

Creditor's name: **Orange County Tax Assessor**

☐ No

Description of property securing debt: **16222 Monterey Ln #376
Huntington Beach, CA 92649
Orange County. APN 891-569-62
Decal No. LBM1081 Title held
by Debtor's single member LLC
J-Sandcastle Co, LLC**

- ☐ Surrender the property.
☐ Retain the property and redeem it.
☐ Retain the property and enter into a
Reaffirmation Agreement.
☒ Retain the property and [explain]:

☒ Yes

**Debtor will retain collateral & continue to
make regular payments.**

Creditor's name: **The Huntington Beach Gables
Homeowners Association**

☐ No

Description of property securing debt: **16222 Monterey Ln #376
Huntington Beach, CA 92649
Orange County. APN 891-569-62
Decal No. LBM1081 Title held
by Debtor's single member LLC
J-Sandcastle Co, LLC**

- ☐ Surrender the property.
☐ Retain the property and redeem it.
☐ Retain the property and enter into a
Reaffirmation Agreement.
☒ Retain the property and [explain]:

☒ Yes

avoid lien using 11 U.S.C. § 522(f)

Creditor's name: **The Huntington Beach Gables
Homeowners Association**

☐ No

Description of property securing debt: **16222 Monterey Ln #376
Huntington Beach, CA 92649
Orange County. APN 891-569-62
Decal No. LBM1081 Title held
by Debtor's single member LLC
J-Sandcastle Co, LLC**

- ☐ Surrender the property.
☐ Retain the property and redeem it.
☐ Retain the property and enter into a
Reaffirmation Agreement.
☒ Retain the property and [explain]:

☒ Yes

avoid lien using 11 U.S.C. § 522(f)

Creditor's name: **The Huntington Beach Gables
Homeowners Association**

☐ No

Description of property securing debt: **16222 Monterey Ln #376
Huntington Beach, CA 92649
Orange County. APN 891-569-62
Decal No. LBM1081 Title held
by Debtor's single member LLC
J-Sandcastle Co, LLC**

- ☐ Surrender the property.
☐ Retain the property and redeem it.
☐ Retain the property and enter into a
Reaffirmation Agreement.
☒ Retain the property and [explain]:

☒ Yes

avoid lien using 11 U.S.C. § 522(f)

Part 2: List Your Unexpired Personal Property Leases

For any unexpired personal property lease that you listed in Schedule G: Executory Contracts and Unexpired Leases (Official Form 106G), fill in the information below. Do not list real estate leases. Unexpired leases are leases that are still in effect; the lease period has not yet ended. You may assume an unexpired personal property lease if the trustee does not assume it. 11 U.S.C. § 365(p)(2).

Describe your unexpired personal property leases

Will the lease be assumed?

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Lessor's name:	Houser Bros Co, dba Rancho Del Rey Mobile Home Estates	<input type="checkbox"/> No
Description of leased Property:	Ground Leasehold until 2059, Space #376, located upon APN 178-011-01 2014 Skyline Villa - Manufactured Home installed on Space 376 July 2, 2014, LBM1081	<input checked="" type="checkbox"/> Yes
Lessor's name:	BS Investor, LP	<input type="checkbox"/> No
Description of leased Property:	Ground Leasehold until 2059, Space #376, located upon APN 178-011-01 2014 Skyline Villa - Manufactured Home installed on Space 376, July 2, 2014, LBM1081	<input checked="" type="checkbox"/> Yes
Lessor's name:	Kia Motors Finance	<input type="checkbox"/> No
Description of leased Property:	2020 Kia Sportage	<input checked="" type="checkbox"/> Yes
Lessor's name:		<input type="checkbox"/> No
Description of leased Property:		<input type="checkbox"/> Yes
Lessor's name:		<input type="checkbox"/> No
Description of leased Property:		<input type="checkbox"/> Yes
Lessor's name:		<input type="checkbox"/> No
Description of leased Property:		<input type="checkbox"/> Yes
Lessor's name:		<input type="checkbox"/> No
Description of leased Property:		<input type="checkbox"/> Yes

Part 3: Sign Below

Under penalty of perjury, I declare that I have indicated my intention about any property of my estate that secures a debt and any personal property that is subject to an unexpired lease.

X 
Jamie Lynn Gallian
Signature of Debtor 1

X _____
Signature of Debtor 2

Date 7/9/2021

Date _____

Fill in this information to identify your case:

Debtor 1 Jamie Lynn Gallian
Debtor 2 _____
(Spouse, if filing)
United States Bankruptcy Court for the: Central District of California
Case number _____
(if known)

Check one box only as directed in this form and in Form 122A-1Supp:

- ☒ 1. There is no presumption of abuse
- ☐ 2. The calculation to determine if a presumption of abuse applies will be made under *Chapter 7 Means Test Calculation* (Official Form 122A-2).
- ☐ 3. The Means Test does not apply now because of qualified military service but it could apply later.

☐ Check if this is an amended filing

Official Form 122A - 1 Chapter 7 Statement of Your Current Monthly Income

04/20

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for being accurate. If more space is needed, attach a separate sheet to this form. Include the line number to which the additional information applies. On the top of any additional pages, write your name and case number (if known). If you believe that you are exempted from a presumption of abuse because you do not have primarily consumer debts or because of qualifying military service, complete and file *Statement of Exemption from Presumption of Abuse Under § 707(b)(2)* (Official Form 122A-1Supp) with this form.

Part 1: Calculate Your Current Monthly Income

1. What is your marital and filing status? Check one only.

- ☒ **Not married.** Fill out Column A, lines 2-11.
- ☐ **Married and your spouse is filing with you.** Fill out both Columns A and B, lines 2-11.
- ☐ **Married and your spouse is NOT filing with you. You and your spouse are:**
- ☐ **Living in the same household and are not legally separated.** Fill out both Columns A and B, lines 2-11.
- ☐ **Living separately or are legally separated.** Fill out Column A, lines 2-11; do not fill out Column B. By checking this box, you declare under penalty of perjury that you and your spouse are legally separated under nonbankruptcy law that applies or that you and your spouse are living apart for reasons that do not include evading the Means Test requirements. 11 U.S.C § 707(b)(7)(B).

Fill in the average monthly income that you received from all sources, derived during the 6 full months before you file this bankruptcy case. 11 U.S.C. § 101(10A). For example, if you are filing on September 15, the 6-month period would be March 1 through August 31. If the amount of your monthly income varied during the 6 months, add the income for all 6 months and divide the total by 6. Fill in the result. Do not include any income amount more than once. For example, if both spouses own the same rental property, put the income from that property in one column only. If you have nothing to report for any line, write \$0 in the space.

	Column A Debtor 1	Column B Debtor 2 or non-filing spouse
2. Your gross wages, salary, tips, bonuses, overtime, and commissions (before all payroll deductions).	\$ 0.00	\$
3. Alimony and maintenance payments. Do not include payments from a spouse if Column B is filled in.	\$ 0.00	\$
4. All amounts from any source which are regularly paid for household expenses of you or your dependents, including child support. Include regular contributions from an unmarried partner, members of your household, your dependents, parents, and roommates. Include regular contributions from a spouse only if Column B is not filled in. Do not include payments you listed on line 3.	\$ 0.00	\$
5. Net income from operating a business, profession, or farm		
	Debtor 1	
Gross receipts (before all deductions)	\$ 0.00	
Ordinary and necessary operating expenses	-\$ 0.00	
Net monthly income from a business, profession, or farm	\$ 0.00	Copy here -> \$ 0.00
6. Net income from rental and other real property		
	Debtor 1	
Gross receipts (before all deductions)	\$ 1,000.00	
Ordinary and necessary operating expenses	-\$ 0.00	
Net monthly income from rental or other real property	\$ 1,000.00	Copy here -> \$ 1,000.00
7. Interest, dividends, and royalties	\$ 0.00	\$

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

8. Unemployment compensation

Do not enter the amount if you contend that the amount received was a benefit under the Social Security Act. Instead, list it here:

For you \$ **0.00**
For your spouse \$

9. Pension or retirement income. Do not include any amount received that was a benefit under the Social Security Act. Also, except as stated in the next sentence, do not include any compensation, pension, pay, annuity, or allowance paid by the United States Government in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services. If you received any retired pay paid under chapter 61 of title 10, then include that pay only to the extent that it does not exceed the amount of retired pay to which you would otherwise be entitled if retired under any provision of title 10 other than chapter 61 of that title.

\$ **0.00** \$

10. Income from all other sources not listed above. Specify the source and amount. Do not include any benefits received under the Social Security Act; payments made under the Federal law relating to the national emergency declared by the President under the National Emergencies Act (50 U.S.C. 1601 et seq.) with respect to the coronavirus disease 2019 (COVID-19); payments received as a victim of a war crime, a crime against humanity, or international or domestic terrorism; or compensation pension, pay, annuity, or allowance paid by the United States Government in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services. If necessary, list other sources on a separate page and put the total below.

\$ **0.00** \$
\$ **0.00** \$
+ \$ **0.00** \$

Total amounts from separate pages, if any.

11. Calculate your total current monthly income. Add lines 2 through 10 for each column. Then add the total for Column A to the total for Column B.

\$ **1,000.00** + \$ = \$ **1,000.00**
Total current monthly income

Part 2: Determine Whether the Means Test Applies to You

12. Calculate your current monthly income for the year. Follow these steps:

12a. Copy your total current monthly income from line 11 **Copy line 11 here=>**

\$ **1,000.00**

Multiply by 12 (the number of months in a year)

x 12

12b. The result is your annual income for this part of the form

12b. \$ **12,000.00**

13. Calculate the median family income that applies to you. Follow these steps:

Fill in the state in which you live.

CA

Fill in the number of people in your household.

1

Fill in the median family income for your state and size of household.

13. \$ **62,938.00**

To find a list of applicable median income amounts, go online using the link specified in the separate instructions for this form. This list may also be available at the bankruptcy clerk's office.

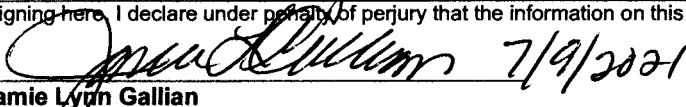
14. How do the lines compare?

14a. ☒ Line 12b is less than or equal to line 13. On the top of page 1, check box 1, *There is no presumption of abuse.* Go to Part 3. Do NOT fill out or file Official Form 122A-2.

14b. ☐ Line 12b is more than line 13. On the top of page 1, check box 2, *The presumption of abuse is determined by Form 122A-2.* Go to Part 3 and fill out Form 122A-2.

Part 3: Sign Below

By signing here, I declare under penalty of perjury that the information on this statement and in any attachments is true and correct.

X  7/9/2021

Jamie Lynn Gallian

Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

Signature of Debtor 1

Date

MM / DD / YYYY

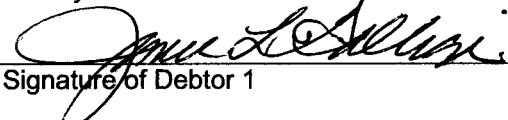
If you checked line 14a, do NOT fill out or file Form 122A-2.

If you checked line 14b, fill out Form 122A-2 and file it with this form.

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Jamie Lynn Gallian 16222 Monterey Ln. #376 Huntington Beach, CA 92649 714-321-3449 jamiegallian@gmail.com	FOR COURT USE ONLY
<input checked="" type="checkbox"/> Debtor(s) appearing without an attorney Attorney for Debtor	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA	
In re: <div style="text-align: center;">Jamie Lynn Gallian</div>	CASE NO.: CHAPTER: 7
Debtor(s).	VERIFICATION OF MASTER MAILING LIST OF CREDITORS [LBR 1007-1(a)]

Pursuant to LBR 1007-1(a), the Debtor, or the Debtor's attorney if applicable, certifies under penalty of perjury that the master mailing list of creditors filed in this bankruptcy case, consisting of 4 sheet(s) is complete, correct, and consistent with the Debtor's schedules and I/we assume all responsibility for errors and omissions.

Date: 7/9/2021


 Signature of Debtor 1

Date: _____

Signature of Debtor 2 (joint debtor)) (if applicable)

Date: _____

Signature of Attorney for Debtor (if applicable)

Jamie Lynn Gallian
16222 Monterey Ln #376
Huntington Beach, CA 92649

David R. Flyer
4120 Birch St. Ste. 101,
Newport Beach, CA 92660

Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653

Frank Satalino
19 Velarde Ct.
Rancho Santa Margarita, CA
92688

Gordon Rees Scully & Mansukhani
5 Park Plaza Ste. 1100
Irvine, CA 92614

Gordon Rees Scully & Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Houser Bros. Co.
DBA Rancho Del Rey Estates
16222 Monterey Ln
Huntington Beach, CA 92649

Houser Bros. Co.dba Rancho Del
Rey Mobile Home Estates
17610 Beach Blvd Ste. 32
Huntington Beach, CA 92647

Huntington Harbor Village
16400 Saybrook
Huntington Beach, CA 92649

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

J-Pad, LLC
2702 N Gaff Street
Orange, CA 92865

James H Cosello
Casello & Lincoln,
525 N Cabrillo Park Dr. Ste 104
Santa Ana, CA 92701

Janine Jasso
c/o Gordon Rees Scully &
Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Janine Jasso
P.O. Box 370161
El Paso, TX 79937

Jennifer Ann Paulin
c/o Gordon Rees Scully &
Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Kia Motors Finance
PO Box 20815
Fountain Valley, CA 92728

Lee S. Gragnano
c/o Gordon Rees Scully &
Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Linda Jean "Lindy" Beck
c/o Gordon Rees Scully &
Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Lisa T. Ryan
20949 Lassen St. Apt 208
Chattsworth, CA 91311

Lori Ann Burrett
c/o Gordon Rees Scully &
Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

Mark A. Mellor Mellor Law Firm
c/o Randall Nickell
6800 Indiana Ave.
Riverside, CA 92506-4267

Michael Chulak-(Unknown)
MChulak@MTCLaw.com

Michael S. Devereux
Wex Law
9171 Wilshire Blvd. Ste. 500
Beverly Hills, CA 90210-5536

Nationwide Reconveyance, LLC
c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653

Orange County Tax Assessor
P.O. Box 149
Santa Ana, CA 92701

Patricia Ryan
20949 Lassen St. Apt 208
Chattsworth, CA 91311

Raquel Flyer-Dashner
4120 Birch St. Ste. 101,
Newport Beach, CA 92660

People of the St of CA
8141 13th Street
Westminster, CA 92683

Randall Nickel
11619 Inwood Drive,
Riverside, CA 92503

Superior Default Services Inc
c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653

Stanley Feldsott, Esq
Feldsott & Lee
23161 Mill Creek Drive
Laguna Hills, CA 92653

Steven A. Fink
13 Corporate Plaza Ste. 150
Newport Beach, CA 92660

The Huntington Beach Gables
Homeowners Association
c/o Epsten Grinnell & Howell,
APC 10200 Willow Creek Road,
Ste 100
San Diego, CA 92131

The Huntington Beach Gables
Homeowners Association
c/o Epsten Grinnell & Howell APC
10200 Willow Creek Road, Ste 100
San Diego, CA 92131

Theodore R "Ted" Phillips
c/o Gordon Rees Scully &
Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071

United Airlines
P.O. Box 0675
Carol Stream, IL 60132-0675

US Bank NA
PO Box 64799
Saint Paul, MN 55164

Vivienne J Alston
Alston, Alston & Diebold
27201 Puerta Real Ste 300
Mission Viejo, CA 92691

EXHIBIT 2

Secured Promissory Note (Fully Amortized)

\$225000

11/16/2018

Huntington Beach, California

On or before 12/16/2048, for value received, the undersigned J-SANDCASTLE CO LLC (the "**Borrower**") promises to pay to the order of J-PAD, LLC (the "**Holder**"), in the manner and at the place provided below, the principal sum of \$225000.

1. PAYMENT.

All payments of principal and interest under this note will be made in lawful money of the United States, without offset, deduction, or counterclaim, by wire transfer of immediately available funds to an account designated by the Holder in writing at least 10 days after the effective date of this note or, if this designation is not made, by check mailed to the Holder at 5782 Pinon Drive, Huntington Beach, California, 92649, or at such other place as the Holder may designate in writing.

2. MONTHLY INSTALLMENT PAYMENTS.

Principal and interest will be payable in 360 consecutive monthly installments of \$1278.00, beginning on or before 12/15/2018 and continuing on the 15th day of each month, until the principal and interest have been paid in full. Each payment will be credited first to interest and then to principal, and interest will cease to accrue on any principal paid. Acceptance by the Holder of any payment differing from the designated installment payment listed above does not relieve the Borrower of the obligation to honor the requirements of this note.

3. INTEREST.

Interest on the unpaid principal balance of this note is payable from the date of this note until this note is paid in full, at the rate of 5.5% per year, or the maximum amount allowed by applicable law, whichever is less. Accrued interest will be computed on the basis of a 365-day or 366-day year, as the case may be, based on the actual number of days elapsed in the period in which it accrues.

4. PREPAYMENT.

The Borrower may prepay this note, in whole or in part, at any time before maturity without penalty or premium. Any partial prepayment will be credited first to accrued interest, then to principal. No prepayment extends or postpones the maturity date of this note.

5. SECURITY FOR PAYMENT.

This note is secured by certain assets of the Borrower in accordance with a separate security agreement dated 11/16/2018 between the Holder and the Borrower (the "**Security Agreement**"). If an Event of Default (defined below) occurs, the Holder will have the rights set forth below and in the Security Agreement.

6. EVENTS OF DEFAULT.

Each of the following constitutes an "**Event of Default**" under this note:

- (a) the Borrower's failure to make any payment when due under the terms of this note, including the final payment due under this note when fully amortized;
- (b) the filing of any voluntary or involuntary petition in bankruptcy by or regarding the Borrower or the initiation of any proceeding under bankruptcy or insolvency laws against the Borrower;
- (c) an assignment made by the Borrower for the benefit of creditors; or
- (d) the appointment of a receiver, custodian, trustee, or similar party to take possession of the Borrower's assets or property.

7. ACCELERATION; REMEDIES ON DEFAULT.

If any Event of Default occurs, all principal and other amounts owed under this note will become immediately due without any action by the Holder, the Borrower, or any other person. The Holder, in addition to any rights and remedies available to the Holder under this note, may, in its sole discretion, pursue any legal or equitable remedies available to it under applicable law or in equity, including taking any of the following actions:

(a) personally, or by agents or attorneys (in compliance with applicable law), take immediate possession of the collateral. To that end, the Holder may pursue the collateral where it may be found, and enter the Borrower's remedies, with or without notice, demand, process of law, or legal procedure if this can be done without breach of the peace. If the premises on which any part of the collateral is located are not under the Borrower's direct control, the Borrower will exercise its best efforts to ensure that the Holder is promptly provided right of access to those premises. To the extent that the Borrower's consent would otherwise be required before a right of access could be granted, the Borrower hereby irrevocably grants that consent;

(b) require the Borrower to assemble the collateral and make it available to the Holder at a place to be designated by the Holder that is reasonably convenient to both parties (it being acknowledged that the Borrower's premises are reasonably convenient to the Borrower);

(c) sell, lease, or dispose of the collateral or any part of it in any manner permitted by applicable law or by contract; and

(d) exercise all rights and remedies of a secured party under applicable law.

8. WAIVER OF PRESENTMENT; DEMAND.

The Borrower hereby waives presentment, demand, notice of dishonor, notice of default or delinquency, notice of protest and nonpayment, notice of costs, expenses or losses and interest on those, notice of interest on interest and late charges, and diligence in taking any action to collect any sums owing under this note, including (to the extent permitted by law) waiving the pleading of any statute of limitations as a defense to any demand against the undersigned. Acceptance by the Holder or any other holder of this note of any payment differing from the designated payments listed does not relieve the undersigned of the obligation to honor the requirements of this note.

9. GOVERNING LAW.

(a) **Choice of Law.** The laws of the state of California govern this note (without giving effect to its conflicts of law principles).

(b) **Choice of Forum.** Both parties consent to the personal jurisdiction of the state and federal courts in Orange, California.

10. COLLECTION COSTS AND ATTORNEYS' FEES.

The Borrower shall pay all expenses of the collection of indebtedness evidenced by this note, including reasonable attorneys' fees and court costs in addition to other amounts due.

11. ASSIGNMENT AND DELEGATION.

(a) No Assignment. The Borrower may not assign any of its rights under this note. All voluntary assignments of rights are limited by this subsection.

(b) No Delegation. The Borrower may not delegate any performance under this note.

(c) Enforceability of an Assignment or Delegation. If a purported assignment or purported delegation is made in violation of this section, it is void.

12. SEVERABILITY.

If any one or more of the provisions contained in this note is, for any reason, held to be invalid, illegal, or unenforceable in any respect, that invalidity, illegality, or unenforceability will not affect any other provisions of this note, but this note will be construed as if those invalid, illegal, or unenforceable provisions had never been contained in it, unless the deletion of those provisions would result in such a material change so as to cause completion of the transactions contemplated by this note to be unreasonable.

13. NOTICES.

(a) Writing; Permitted Delivery Methods. Each party giving or making any notice, request, demand, or other communication required or permitted by this note shall give that notice in writing and use one of the following types of delivery, each of which is a writing for purposes of this note: personal delivery, mail (registered or certified mail, postage prepaid, return-receipt requested), nationally recognized overnight courier (fees prepaid), facsimile, or email.

(b) Addresses. A party shall address notices under this section to a party at the following addresses:

If to the Borrower:

J-Sandcastle Co LLC

5782 Pinon Drive

Huntington Beach, California 92649

jamiegallian@gmail.com

If to the Holder:

J-Pad, LLC

5782 Pinon Drive

Huntington Beach, California 92649

jamiegallian@gmail.com

(c) Effectiveness. A notice is effective only if the party giving notice complies with subsections (a) and (b) and if the recipient receives the notice.

14. WAIVER.

No waiver of a breach, failure of any condition, or any right or remedy contained in or granted by the provisions of this note will be effective unless it is in writing and signed by the party waiving the breach, failure, right, or remedy. No waiver of any breach, failure, right, or remedy will be deemed a waiver of any other breach, failure, right, or remedy, whether or not similar, and no waiver will constitute a continuing waiver, unless the writing so specifies.

15. HEADINGS.

The descriptive headings of the sections and subsections of this note are for convenience only, and do not affect this note's construction or interpretation.

[SIGNATURE PAGE FOLLOWS]

ATTACHEMENT

I, JAMIE L. GALLIAN, MEMBER of J-Sandcastle Co, LLC certify under
penalty of perjury that the contents of this Document are true.

I declare I am the person who executed this instrument in my capacity
as the sole Member of J-Sandcastle Co, LLC which execution is my act
and deed.

Signed this 16th day of November, 2018, at Huntington Beach, CA 92649


Jamie L. Gallian

MEMBER, J-Sandcastle Co LLC

ATTACHEMENT

I, JAMIE L. GALLIAN, MEMBER OF J-Pad, LLC certify under penalty perjury,

that the contents contained in this Document are true.

I declare, I am AUTHORIZED Member of J-Pad, LLC to act and I

accept this instrument on behalf of J-Pad, LLC, which is my act and deed.

Signed this 16th day of November, 2018, at Huntington Beach, CA 92649

J-PAD, LLC




Jamie L. Gallian, MEMBER

ATTACHMENT

||. I certify under penalty of perjury that the contents of this Document are true.
I declare, I am the person who executed this instrument, which execution is my act and deed.

Signature of Authorized Person:


Jamie L. Gallian

11. I certify under penalty of perjury that the contents of this Document are true. I declare I am the person who executed this instrument, which execution is my act and deed.

Signature of Authorized Person:


ANTHONY CALDERON, Manager of J-Pad, LLC

A notary public or other officer completing this certificate verifies only the identity of the individual(s) who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA
COUNTY OF ORANGE


Jamie L. Gallian

On before me, personally appeared Jamie L Gallian who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

 (Notary Seal)
Signature of Notary Public



A notary public or other officer completing this certificate verifies only the identity of the individual(s) who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA
COUNTY OF ORANGE


Anthony Calderon

On before me, personally appeared Anthony Calderon on behalf of who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.


 (Notary Seal)
Signature of Notary Public





EXHIBIT 3

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Jamie Gallian 714-321-3449
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) Jamie Lynn Gallian 16222 Monterey Ln #376 Huntington Beach, CA 92649 USA

DOCUMENT NUMBER: 76027940003
FILING NUMBER: 19-7691916827
FILING DATE: 01/14/2019 09:10

**IMAGE GENERATED ELECTRONICALLY FOR WEB FILING
 THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY**

1. DEBTOR'S NAME: Provide only <u>one</u> Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here <input type="checkbox"/> and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)				
OR	1a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC			
	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
1c. MAILING ADDRESS 16222 MONTEREY LN #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649
2. DEBTOR'S NAME: Provide only <u>one</u> Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here <input type="checkbox"/> and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)				
OR	2a. ORGANIZATION'S NAME			
	2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE
3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only <u>one</u> Secured Party name (3a or 3b)				
OR	3a. ORGANIZATION'S NAME J-Pad, LLC - CA SOS Entity No. 201804010750			
	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS 2702 N GAFF ST		CITY ORANGE	STATE CA	POSTAL CODE 92865
4. COLLATERAL: This financing statement covers the following collateral: LOCATED ON PROPERTY RECORDED IN ORANGE COUNTY CLERK RECORDERS OFFICE IN CALIFORNIA PARCEL MAP RECORDED IN BOOK 108, PG(S) 47-48. ASSESSORS PARCEL NUMBER 891-569-62 SERIAL NUMBERS AC7V710394GB, AC7V710394GA; DECAL NUMBER LBM1081				
5. Check <u>only</u> if applicable and check <u>only</u> one box: Collateral is <input type="checkbox"/> held in a Trust (see UCC1Ad, item 17 and instructions) <input type="checkbox"/> being administered by a Decedent's Personal Representative				
6a. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Public-Finance Transaction <input checked="" type="checkbox"/> Manufactured-Home Transaction <input type="checkbox"/> A Debtor is a Transmitting Utility			6b. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Agricultural Lien <input type="checkbox"/> Non-UCC Filing	
7. ALTERNATIVE DESIGNATION (if applicable): <input type="checkbox"/> Lessee/Lessor <input type="checkbox"/> Consignee/Consignor <input type="checkbox"/> Seller/Buyer <input type="checkbox"/> Bailee/Bailor <input type="checkbox"/> Licensee/Licensor				
8. OPTIONAL FILER REFERENCE DATA:				

FILING OFFICE COPY

UCC FINANCING STATEMENT ADDENDUM

FOLLOW INSTRUCTIONS

9. NAME OF FIRST DEBTOR: Same as line 1a or 1b on Financing Statement; if line 1b was left blank because individual Debtor name did not fit, check here <input type="checkbox"/>					
OR	9a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC				
	9b. INDIVIDUAL'S SURNAME				
	FIRST PERSONAL NAME				
	ADDITIONAL NAME(S)/INITIAL(S)			SUFFIX	
DOCUMENT NUMBER: 76027940003 IMAGE GENERATED ELECTRONICALLY FOR WEB FILING THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY					
10. DEBTOR'S NAME: Provide (10a or 10b) only <u>one</u> additional Debtor name or Debtor name that did not fit in line 1b or 2b of the Financing Statement (Form UCC1) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name) and enter the mailing address in line 10c					
OR	10a. ORGANIZATION'S NAME				
	10b. INDIVIDUAL'S SURNAME				
	INDIVIDUAL'S FIRST PERSONAL NAME				
	INDIVIDUAL'S ADDITIONAL NAME(S)/INITIAL(S)			SUFFIX	
10c. MAILING ADDRESS		CITY	STATE	POSTAL CODE	COUNTRY
11. <input type="checkbox"/> ADDITIONAL SECURED PARTY'S NAME or <input checked="" type="checkbox"/> ASSIGNOR SECURED PARTY'S NAME: Provide only <u>one</u> name (11a or 11b)					
OR	11a. ORGANIZATION'S NAME				
	11b. INDIVIDUAL'S SURNAME GALLIAN	FIRST PERSONAL NAME JAMIE	ADDITIONAL NAME(S)/INITIAL(S) LYNN		SUFFIX
11c. MAILING ADDRESS 16222 MONTEREY LANE #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649	COUNTRY USA
12. ADDITIONAL SPACE FOR ITEM 4 (collateral):					
13. <input type="checkbox"/> This FINANCING STATEMENT is to be filed [for record] (or recorded) in the REAL ESTATE RECORDS (if applicable)			14. This FINANCING STATEMENT: <input type="checkbox"/> covers timber to be cut <input type="checkbox"/> covers as-extracted collateral <input type="checkbox"/> is filed as a fixture filing.		
15. Name and address of RECORD OWNER of real estate described in item 16 (if Debtor does not have a record interest):			16. Description of real estate:		
17. MISCELLANEOUS:					

FILING OFFICE COPY

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Jamie Gallian 714-321-3449
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) Jamie Lynn Gallian 16222 Monterey Ln #376 Huntington Beach, CA 92649 USA

DOCUMENT NUMBER: 76027940002
FILING NUMBER: 19-7691915674
FILING DATE: 01/14/2019 08:55

**IMAGE GENERATED ELECTRONICALLY FOR WEB FILING
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1. DEBTOR'S NAME: Provide only <u>one</u> Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here <input type="checkbox"/> and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)				
OR	1a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC			
	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
1c. MAILING ADDRESS 16222 MONTEREY LN #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649
2. DEBTOR'S NAME: Provide only <u>one</u> Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here <input type="checkbox"/> and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)				
OR	2a. ORGANIZATION'S NAME			
	2b. INDIVIDUAL'S SURNAME GALLIAN	FIRST PERSONAL NAME JAMIE	ADDITIONAL NAME(S)/INITIAL(S) LYNN	SUFFIX
2c. MAILING ADDRESS 16222 MONTEREY LANE #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649
3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only <u>one</u> Secured Party name (3a or 3b)				
OR	3a. ORGANIZATION'S NAME J-Pad, LLC - CA SOS Entity No. 201804010750			
	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS 2702 N GAFF STREET		CITY ORANGE	STATE CA	POSTAL CODE 92865
4. COLLATERAL: This financing statement covers the following collateral: LOCATED ON CLERK RECORDER OFFICE OF ORANGE COUNTY CALIFORNIA FILED DECEMBER 20, 1977, PARCEL MAP BOOK NO. 108 PG(S) 47, 48, T.P.M. 77-7, R.S.T.8531 SERIAL NUMBER AC7V710394GB, AC7V710394GA; DECAL NUMBER LBM1081 ASSESSORS PARCEL NUMBER 891-569-62				
5. Check <u>only</u> if applicable and check <u>only</u> one box: Collateral is <input type="checkbox"/> held in a Trust (see UCC1Ad, item 17 and instructions) <input type="checkbox"/> being administered by a Decedent's Personal Representative				
6a. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Public-Finance Transaction <input type="checkbox"/> Manufactured-Home Transaction <input type="checkbox"/> A Debtor is a Transmitting Utility			6b. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Agricultural Lien <input type="checkbox"/> Non-UCC Filing	
7. ALTERNATIVE DESIGNATION (if applicable): <input type="checkbox"/> Lessee/Lessor <input type="checkbox"/> Consignee/Consignor <input type="checkbox"/> Seller/Buyer <input type="checkbox"/> Bailee/Bailor <input type="checkbox"/> Licensee/Licenser				
8. OPTIONAL FILER REFERENCE DATA:				

FILING OFFICE COPY

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Jamie Gallian 714-321-449
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) J-Pad, LLC 5782 Pinon Drive Huntington Beach, CA 92649 USA

DOCUMENT NUMBER: 76027030002
FILING NUMBER: 19-7691905279
FILING DATE: 01/14/2019 08:16

**IMAGE GENERATED ELECTRONICALLY FOR WEB FILING
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1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	1a. ORGANIZATION'S NAME J-Sandcastle Co LLC				
	1b. INDIVIDUAL'S SURNAME 	FIRST PERSONAL NAME 	ADDITIONAL NAME(S)/INITIAL(S) 	SUFFIX 	
1c. MAILING ADDRESS 16222 Monterey Lane #376		CITY Huntington Beach	STATE CA	POSTAL CODE 92649	COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	2a. ORGANIZATION'S NAME 				
	2b. INDIVIDUAL'S SURNAME Gallian	FIRST PERSONAL NAME Jamie	ADDITIONAL NAME(S)/INITIAL(S) Lynn	SUFFIX 	
2c. MAILING ADDRESS 16222 Monterey Ln #376		CITY Huntington Beach	STATE CA	POSTAL CODE 92649	COUNTRY USA

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

OR	3a. ORGANIZATION'S NAME J-Pad, LLC - CA SOS Entity No. 201804010750				
	3b. INDIVIDUAL'S SURNAME 	FIRST PERSONAL NAME 	ADDITIONAL NAME(S)/INITIAL(S) 	SUFFIX 	
3c. MAILING ADDRESS 2702 N GAFF STREET		CITY ORANGE	STATE CA	POSTAL CODE 92865	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:
 ORANGE COUNTY CALIFORNIA ASSESSOR'S PARCEL NUMBER 891-569-62
 SERIAL NUMBERS AC7V710394GB, AC7V710394GA
 DECAL NUMBER LBM1081

5. Check only if applicable and check only one box: Collateral is ☐ held in a Trust (see UCC1Ad, item 17 and instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Public-Finance Transaction <input checked="" type="checkbox"/> Manufactured-Home Transaction <input type="checkbox"/> A Debtor is a Transmitting Utility	6b. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Agricultural Lien <input type="checkbox"/> Non-UCC Filing
--	---

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor
☐ Consignee/Consignor
☐ Seller/Buyer
☐ Bailee/Bailor
☐ Licensee/Licenser

8. OPTIONAL FILER REFERENCE DATA:

FILING OFFICE COPY

EXHIBIT 4



DTN: 12153896

Decal: LBM1081

Unit ID: 252606085

Trans Type: L/O Assignment

Trans Date: 02/01/2021

Trade Name: CUSTOM VILLA

Serial #: AC7V710394GA, AC7V710394GB

Insignia # PFS1130281, PFS1130282

Status Date: 02/23/2021 User Name: SHAH, KIRAN

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

CERTIFICATE OF TITLE

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model --		DOM 05/29/2014	DFS 07/28/2014	RY
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Jan 19, 2019	

Addressee

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Registered Owner(s)

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____

State _____

SECTION B - RELEASING SIGNATURES

1a. _____
Signature of Registered Owner

1b. _____ Date of Release _____

2. _____
Legal Owner of Record (if any) sign and check appropriate box

release ☐ Retain ☐ Assign Interest

(* If Assign Interest is checked, Complete New Legal Owner Below)

SECTION C - NEW OWNER INFORMATION

NEW REGISTERED OWNER - Please Print or Type Clearly

3a. _____ New Registered Owners Name

3c. _____ New Registered Owners Name

3b. _____ New Registered Owners Name

3d. _____ New Registered Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box.

- ☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☒ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship

4. _____ Mailing Address of New Registered Owner

City/State _____ Zip Code _____

5. _____ Actual Location Address of Unit

City/State _____ Zip Code _____

6. _____ Purchase Price or check box if Gift ☒ _____ Date of Transfer Date

7a. _____ Signature of New Registered Owners

Signature of New Registered Owners

7b. _____ Signature of New Registered Owners

7d. _____ Signature of New Registered Owners

NEW LEGAL OWNER - Please Print or Type Clearly

8a. BRIAN J. GALLIAN New Legal Owners Name

8b. Steven D. Gallian New Legal Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box below.

- ☒ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☒ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship

9. 16222 Monterey Ln #376 Mailing Address of New Legal Owner

Huntington Beach, CA City/State 92649 Zip Code

NEW JUNIOR LIENHOLDER - Please Print or Type Clearly

10a. _____ New Junior Lienholder Name

10b. _____ New Junior Lienholder Name

11. _____ Mailing Address of New Junior Lienholder

City/State _____ Zip Code _____

SECTION D - RELEASE OF DEALERS

12. _____ Signature of Selling Dealer

Print Dealers Name and Dealer Number

**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
REGISTRATION CARD**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model -	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Jan 19, 2019	

Addressee

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

**Registered Owner(s)**

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

ATTENTION OWNER:

**THIS IS THE REGISTRATION CARD FOR THE
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS
CARD IN A SAFE PLACE WITHIN THE UNIT.**

INSTRUCTIONS FOR RENEWAL:

**REGISTRATION FOR THIS UNIT EXPIRES ON THE
DATE INDICATED ABOVE IN THE BOX LABELED
"Exp. Date". THERE ARE SUBSTANTIAL
PENALTIES FOR DELINQUENCY. IF YOU DO NOT
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS
PRIOR TO THE EXPIRATION DATE, CONTACT
H.C.D. FOR RENEWAL INSTRUCTIONS.**

IMPORTANT

**THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.**

DTN: 10670236

01192019 - 1

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s): LBM 1081	Trade Name:	Serial No.(s):
---	-------------	----------------

I/We, the undersigned, hereby state:

The original paperwork to add legal owner was lost in the mail. Customer sent photocopies of the application. Representative for J-Sandcastle LLC, Jamie Gallian states the legal owner is Joint Ronald J. Pierpont and J Pad LLC at the same address: 16222 Monterey Ln # 376 Huntington Beach CA 92649

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 02/22/2021 at Sacramento, CA
Date City State

Signature(s): <u>Rebecca O'Loughlin</u>	Printed name(s): <u>Rebecca O'Loughlin, Program Tech III</u>
--	---

Address _____

City _____ State _____

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT TO ENCUMBER

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES CUSTOM VILLA

The Serial Number(s) is: AC7V710394GB/GA

SECTION II. LEGAL OWNER INFORMATION

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

Ronald J. Pierpont, Member J Pad LLC
(Name of New Legal Owner)

Address: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649
Street Address or P.O. Box City State Zip

SECTION III. CERTIFICATION

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/20/2020 at HUNTINGTON BEACH, CALIFORNIA
Date City State

Signature of each registered owner:

Printed name of each registered owner:

Jamie L. Gallian, Member

J-SANDCASTLE CO LLC JAMIE L. GALLIAN, MEMBER

Address: 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649
Street Address or P. O. Box City State Zip

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s): LBM1081	Trade Name: Custom Villa	Serial No.(s): AC7V710394GB AC7V710394GA
------------------------------------	-----------------------------	--

I/We, the undersigned, hereby state:

J-Sandcastle wishes to disregard former
Statement to Encumber / Lien Assignment
for favor of NEW legal owner J-Pad LLC
Ronald S. Pierpont. The new legal owner
is J-Pad LLC, Ronald S Pierpont, Member.

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 8/20/2020 at Huntington Beach, CA
Date City State

Signature(s):

Printed name(s):

J-Sandcastle CO LLC
By Janiel Balian
JANIEL B. BAIAN

J-Sandcastle CO LLC

Address 16222 Monterey Ln #376

City Huntington Beach State CA

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

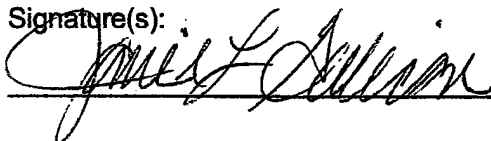
Decal (License) No.(s):	Trade Name:	Serial No.(s):
LBM 1081	SKYLINE HOMES	AC7V710394GB/GA

I/We, the undersigned, hereby state: J-Sandcastle Co LLC
made errors on the Certificate of Title.
The only change to the Certificate of Title
is the addition of two names as Legal
Owners as indicated on the Statement to
Examiner dated 8/20/2020. The Legal Owners to
be added to the Certificate of Title are STEVEN D. GALLIAN
BRIAN J. GALLIAN

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 08/20/2020 at HUNTINGTON BEACH CA
Date City State

Signature(s): 	Printed name(s): J-SANDCASTLE CO LLC JAMIE GALLIAN MEMBER
--	--

Address 16222 MONTEREY LN. #376
City HUNTINGTON BEACH State CA

Copy

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT TO ENCUMBER

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES CUSTOM VILLA

The Serial Number(s) is: ACTV710394GB/GA

SECTION II. LEGAL OWNER INFORMATION

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

STEVEN D GALLIAN AND BRIAN J. GALLIAN JOINT TENANTS Right of Survivorship

(Name of New Legal Owner)

Address: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649

Street Address or P.O. Box

City

State

Zip

SECTION III. CERTIFICATION

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/20/2020 at HUNTINGTON BEACH, CALIFORNIA

Date

City

State

Signature of each registered owner:

Printed name of each registered owner:

Jamie L. Gallian, Member

J-SANDCASTLE CO LLC JAMIE L. GALLIAN, MEMBER

Address: 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Street Address or P. O. Box

City

State

Zip

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



LIEN ASSIGNMENT

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM 1081

The Trade Name is: SKYLINE HOMES CUSTOM VILLA

The Serial Number(s) is: ACTV710394GB/GA

SECTION II. NAME AND ADDRESS OF PARTY ASSIGNING LIEN (ASSIGNOR)

Name of Assignor: J-SANDCASTLE CO LLC, JAMIE L. GALLIAN, MEMBER

Mailing Address of Assignor: 16222 Monterey Ln. #376 Huntington Beach CA 92649

Street Address or P.O. Box

City

State

Zip

SECTION III. DEBTOR(S) NAME AND ADDRESS

Name of Debtor(s): J-SANDCASTLE CO LLC, JAMIE L. GALLIAN, MEMBER

Mailing Address of Debtor(s): 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Street Address or P.O. Box

City

State

Zip

Location Address: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649

Street Address

City

County

State

SECTION IV. NAME AND ADDRESS OF PARTY TO WHICH LIEN HAS BEEN ASSIGNED (ASSIGNEE)

Name of Assignee: STEVEN D. GALLIAN AND BRIAN J. GALLIAN, JOINT TENANTS Right of Survivorship

Mailing Address of Assignee: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649

Street Address or P.O. Box

City

State

Zip

SECTION V. ASSIGNOR'S CERTIFICATION

I/We the assignor certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct that my/our lien in the name of the debtor(s), for the described unit, has been transferred to the assignee on 8/20/2020

Date of Lien Assignment

Executed on 8/20/2020 at HUNTINGTON BEACH, CA

Date

City

State

Signature of Authorized Agent: 

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of ORANGE

On AUG,28,2020 before me, ALEX MAJDPUR NOTARY PUBLIC
(insert name and title of the officer)

personally appeared JAMIE LYNN GALLIAN
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



(Seal)

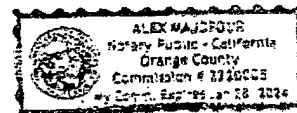


EXHIBIT 5



DTN: 12313525

Decal: LBM1081

Unit ID: 252606085

Trans Type: R/O Transfer - No Sale

Trans Date: 07/14/2021

Trade Name: CUSTOM VILLA

Serial #: AC7V710394GA, AC7V710394GB

Insignia # PFS1130281, PFS1130282

Status Date: 08/02/2021 User Name: SHAH, KIRAN

2

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model		DOM	DFS	RY
90002 SKYLINE HOMES INC	CUSTOM VILLA			05/29/2014	07/28/2014	
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Feb 24, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

Addressee

RONALD J PIERPONT
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

JUL 14 2021

Registered Owner(s)

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Legal Owner(s)

RONALD J PIERPONT
JPAD LLC
Tenants in Common Or
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Lien Perfected On: 08/20/20 11:58:00

12313525

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 2/25/2021 at Huntington Beach CALIFORNIA
City State

Jamil Lynn Gallian
Signature

J SANDCASTLE COLLE
Printed Name

SECTION B - RELEASING SIGNATURES

1a. J SANDCASTLE COLLE Jamil Lynn Gallian Date of Release 2/25/2021
Releasing Signature of Registered Owner

1b. _____ Date of Release _____
Releasing Signature of Registered Owner

2. _____ ☒ Release ☐ Retain * ☐ Assign Interest
Legal Owner of Record (if any) sign and check appropriate box (* If Assign Interest is checked - Complete New Legal Owner Below)

SECTION C - NEW OWNER INFORMATION**NEW REGISTERED OWNER - Please Print or Type Clearly**

3a. JAMIL LYNN GALLIAN 3c. J SANDCASTLE COLLE
New Registered Owners Name New Registered Owners Name

3b. J SANDCASTLE COLLE 3d. _____
New Registered Owners Name New Registered Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
(* If this box is checked-Complete HCD 476.6B)

☒ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship

4. 16222 Monterey Ln #376 Huntington Beach, CA 92649
Mailing Address of New Registered Owner City/State Zip Code

5. 16222 Monterey Ln #376 Huntington Beach, CA 92649
Actual Location Address of Unit City/State Zip Code

6. 0 2/25/2021
Purchase Price or check box if Gift- ☒ Purchase Date or Transfer Date

7a. Jamil Lynn Gallian 7c. J SANDCASTLE COLLE
Signature of New Registered Owners Signature of New Registered Owners

7b. J SANDCASTLE COLLE Jamil Lynn Gallian
Signature of New Registered Owners Signature of New Registered Owners

NEW LEGAL OWNER - Please Print or Type Clearly

8a. J PAD, LLC 8b. _____
New Legal Owners Name New Legal Owners Name

If more than one New Lender going onto title, please check the appropriate Co-owner term box below.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
(* If this box is checked-Complete HCD 476.6B)

☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship

9. 16222 Monterey Ln #376 Huntington Beach, CA 92649
Mailing Address of New Legal Owner City/State Zip Code

NEW JUNIOR LIENHOLDER - Please Print or Type Clearly

10a. _____ 10b. _____
New Junior Lienholder Name New Junior Lienholder Name

11. _____
Mailing Address of New Junior Lienholder City/State Zip Code

SECTION D - RELEASE OF DEALERS

12. _____
Signature of Selling Dealer Print Dealers Name and Dealer Number

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange)

On 2/25/21 before me, Greg Buysman, Notary Public
(insert name and title of the officer)

personally appeared Jessie Lynn Collins
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature

[Signature]

(Seal)

GREG BUYSMAN
COMM # 234148
ORANGE COUNTY
California Notary Public
My Comm. Expires 02/28/25



Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model	DOM	DFS	RY	Exp. Date
90002 SKYLINE HOMES INC	CUSTOM VILLA		05/29/2014	07/28/2014		
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Feb 24, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

Addressee

RONALD J PIERPONT
 16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649



Registered Owner(s)

J-SANDCASTLE CO LLC
 16222 MONTEREY LANE ROOM 376
 HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649

Legal Owner(s)

RONALD J PIERPONT
 JPAD LLC
 Tenants in Common Or
 16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649
 Lien Perfected On: 08/20/20 11:58:00

**LEGAL OWNER COPY
 INFORMATION ONLY**

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
 DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
 CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model	DOM	DFS	RY	Exp. Date
90002 SKYLINE HOMES INC	CUSTOM VILLA		05/29/2014	07/28/2014		
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Feb 24, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

Addressee

J-SANDCASTLE CO LLC
 16222 MONTEREY LANE ROOM 376
 HUNTINGTON BEACH, CA 92649



Registered Owner(s)

J-SANDCASTLE CO LLC
 16222 MONTEREY LANE ROOM 376
 HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649

Legal Owner(s)

RONALD J PIERPONT
 JPAD LLC
 Tenants in Common Or
 16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649
 Lien Perfected On: 08/20/20 11:58:00

ATTENTION OWNER:

THIS IS THE REGISTRATION CARD FOR THE
 UNIT DESCRIBED ABOVE. PLEASE KEEP THIS
 CARD IN A SAFE PLACE WITHIN THE UNIT.

INSTRUCTIONS FOR RENEWAL:

REGISTRATION FOR THIS UNIT EXPIRES ON THE
 DATE INDICATED ABOVE IN THE BOX LABELED
 "Exp. Date". THERE ARE SUBSTANTIAL
 PENALTIES FOR DELINQUENCY. IF YOU DO NOT
 RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS
 PRIOR TO THE EXPIRATION DATE, CONTACT
 H.C.D. FOR RENEWAL INSTRUCTIONS.

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
 DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
 CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

STATE OF CALIFORNIA
Main Document Page 135 of 316
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM

**LIEN SATISFIED****SECTION I. DESCRIPTION OF UNIT**

This unit is a:

☒ Manufactured Home/Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper
The Decal (License) No.(s) of the unit is: LBM1081The Trade Name of the unit is: CUSTOM VILLAThe Serial No.(s) of the unit is: AC7V710394GB/AC7V710394GA**SECTION II. DEBTOR(S) NAME(S)**Name of Debtor(s): J-SANDCASTLE CO, LLC**SECTION III. LIENHOLDER'S CERTIFICATION**

This is to certify that our/my lien in the name(s) of the debtor(s) shown above against the described unit has been fully satisfied and has not been assigned to any other party.

I/We certify under penalty of perjury that the foregoing is true and correct.

Print or Type Name of Legal Owner or Jr. Lienholder (Lender):

J-PAD LLC or RONALD J. PIERPONT

Signature of Legal Owner, Jr. Lienholder (Lender) or their Authorized Agent:

Ronald J Pierpont

Date 7/9/2021

Address 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649
Street Address or P.O. Box City State Zip

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):
LBM 1081

Trade Name:
Skyline Custom Villa

Serial No.(s):
AC7V710394GB/GA

I/We, the undersigned, hereby state:

Jamie Lynn Gallian is the sole registered owner of 2014 home. J-Pad LLC or Robert McLelland is the Legal Owner.

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 25th of Feb. 2021 at Huntington Beach, CA 92649
Date City State

Signature(s):

A handwritten signature in black ink, appearing to read "Jamie Lynn Gallian", written over a horizontal line.

Printed name(s):
Jamie Lynn Gallian

21742 Anza Avenue

Address

Torrance

City

CA 90503

State

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

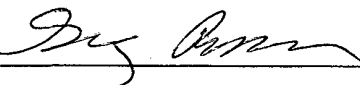
County of Orange)

On 2/25/21 before me, Greg Buysman, Notary Public
(insert name and title of the officer)

personally appeared Terrie Lynn Collins
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature  (Seal)



STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s): LBM1081	Trade Name:	Serial No.(s):
--	-------------	----------------

I/We, the undersigned, hereby state:

I spoke with Jamie Gallian and she states the unit should be registered as Jamie Gallian as sole registered owner. The lien has been satisfied and there is no legal owner at this time. Jamie advised the county and was told there was no need to revise the Tax Clearance Certificate.

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 7/28/21 at Sacramento, CA
Date City State

Signature(s): <i>Fabiana M. O'Loughlin</i>	Printed name(s): <i>Fabiana M O'Loughlin, Program Tech II</i>
---	--

Address _____

City _____ State _____

State of California
Department of Housing and Community Development
Division of Codes and Standards
Registration and Titling Program
P.O. Box 277820, Sacramento, CA 95827-7820
(800) 952-8356
www.hcd.ca.gov



MULTI-PURPOSE TRANSFER FORM

PLEASE COMPLETE ONLY THE SECTIONS THAT APPLY AND SIGN BOTTOM OF FORM

UNIT DESCRIPTION

Decal (License) No.(s): LBM1081

Serial No.(s): AC7V710394GA; AV7V710394GA

SMOKE DETECTOR AND CARBON MONOXIDE CERTIFICATION

I/We, the undersigned, hereby state that the manufactured home, mobilehome, or multifamily manufactured home described above is equipped with a properly working, operable smoke detector in accordance with California Health and Safety Code Section 18029.6 and a carbon monoxide detector in accordance to California Residential Code Section R315.

☒ YES ☐ NO

PARK PURCHASE FEE EXEMPTION

The registered owner of the above-described manufactured home/mobilehome that is located on private property owned by the registered owner is exempt from payment of the \$5 Park Purchase Fund (PPF) fee (Health and Safety Code Section 18114.1). If you feel you qualify for the exemption, complete the following questions:

- Do you (the registered owner) own your manufactured home/mobilehome? ☒ YES ☐ NO
- Do you (the registered owner) own the land your manufactured home/mobilehome is located on? ☐ YES ☒ NO

DESIGNATION OF CO-OWNER TERM

We request the Department of Housing and Community Development to register our ownership interest in the unit described above with the following co-owner term: **(READ CAREFULLY AND CHECK ONE BOX.)**

- ☐ **JTRS (Joint Tenants with Right of Survivorship):** Upon the death of a joint tenant, the interest of the deceased party passes to the surviving joint tenant. The signature of each joint tenant is required to transfer or encumber the title.
- ☒ **TENCOM AND (Tenants in Common with the names joined by the word AND):** Each tenant in common may transfer his or her individual interest without the signature of the other tenant(s) in common. The signature of each tenant in common is required to transfer full interest in the unit to a new registered owner or to encumber the title.
- ☐ **TENCOM OR (Tenants in Common with the names joined by the word OR):** Any one of the tenants in common may transfer full ownership interest in the unit to a new registered owner without the signature of the other tenant(s) in common. The signature of each tenant in common is required to encumber the title.
- ☐ **COMPRO (Community Property):** A unit may be registered as community property in the names of a husband and wife. The signature of each spouse is required to transfer full interest in the unit or encumber the title.
- ☐ **COMPRORS (Community Property with Right of Survivorship):** A unit may be registered as community property in the names of a husband and wife. At the death of one spouse, the decedent's community property interest passes to the surviving spouse without administration. The signature of each spouse is required to transfer full interest in the unit or encumber the title.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above described unit in California, or from, issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 02/25/2021

at HUNTINGTON BEACH,

CALIFORNIA

COUNTY OF ORANGE

Signature Jamie Lynn Gallian

City J-SANDCASTLE CO LLC, JAMIE LYNN GALLIAN, State IT'S MEMBER

Signature

Signature

PHONE #: (714) 321-3449

E-MAIL ADDRESS: jamiegallian@gmail.com

Decal (License) No.(s): LBM1081

Serial No.(s): AC7V710394GA; AC7V710394GA

DECLARATION OF INSTALLATION OF WATER HEATER SEISMIC BRACING

I/We the undersigned hereby state that all fuel gas-burning water heater appliances in the manufactured home, mobilehome, or multifamily manufactured housing described above are seismically braced, anchored, or strapped in accordance with Health and Safety Code Section 18031.7 and Part 5 of Title 24 of the California Code of Regulations.

☒ YES ☐ NO ☐ Electric water heater is installed per manufacturer's instructions.

SIGNATURE ON FRONT SIDE IS CERTIFICATION FOR THIS SECTION

REASON FOR USE TAX AND/OR MOBILEHOME RECOVERY FUND FEE EXEMPTION

Check appropriate box(es):

☒ The above-described unit was a gift. All rights and interest of ownership were transferred without exchange or money or other valuable consideration.

☒ The above-described unit has been acquired from: J-SANDCASTLE CO LLC, JAMIE LYNN GALLIAN, ITS MEMBER
parents, spouse, grandparent(s), grandchild, child, brother(s)*, sister(s)*

☒ The name of a CO-OWNER is being ☒ ADDED ☐ DELETED to the record.
show relationship

☐ The above-described unit was received as the result of an inheritance.

☐ Transfer of the above-described unit is being made pursuant to a court order.

☐ The transfer of the unit is being made to a revocable trust which (1) the seller has an unrestricted power to revoke the trust, (2) the transfer does not result in any change in the beneficial ownership of the property, (3) the trust provides that upon revocation of the trust the property will revert wholly to the seller, and (4) the only consideration for the transfer is the assumption by the trust of an existing loan for which the tangible personal property being transferred is the sole collateral for the assumed loan.

*NOTE: A sale between brother(s) or sister(s) is subject to use tax unless both are minors. If minors, check here: ☐

SIGNATURE ON FRONT SIDE IS CERTIFICATION FOR THIS SECTION

DESIGNATION OF TRUST

I/We, the undersigned trustee(s), hereby state that the unit described above has been placed into a trust. This Declaration of Trust is dated _____.

In compliance with Section 18080.1(b) of the California Health and Safety Code, I/we as trustee(s) hereby request the unit described above be registered as shown below. I/We acknowledge that the Department's permanent title record and the titling documents for the unit will reflect the information as shown below.

Print Name of the Trust. This is how the name of the Trust will appear on title.

I/We as trustee(s) agree(s) to notify and make application with the Department of Housing and Community Development to appropriately amend the permanent registration and titling record immediately upon any change to the original trust agreement described herein by submitting this form along with all appropriate documents, fees or any other needed items to the Department.

I/We as trustee(s) further agree(s) to indemnify and save harmless the Director of the Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above described unit in California and from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____
Date City State

Trustee Signature(s): _____

Street Address or P.O. Box _____
City State



TAX CLEARANCE CERTIFICATE

☒ Mobile Home

☐ Floating Home

COUNTY OF ORANGE

SERIAL NUMBER/HULL NUMBER AC7V710394GA, AC7V710394GB	DECAL NUMBER/CF NUMBER LBM1081
LOCATION OF HOME 16222 MONTEREY LN 376 HUNTINGTON BEACH	ASSESSOR'S PARCEL NUMBER 891-569-62
CURRENT REGISTERED OWNER J-SANDCASTLE CO LLC 16222 MONTEREY LN SPC 376 HUNTINGTON BEACH CA 92649	APPLICANT J-SANDCASTLE CO LLC & JAMIE L GALLIAN 16222 MONTEREY LN #376 HUNTINGTON BEACH CA 92649

I hereby certify that the following has been paid:

- ☐ Delinquent license fees
- ☐ Property taxes applicable to the home identified above through the fiscal year
- ☒ A security deposit for payment of the property taxes for the fiscal year 2021-2022
- ☒ No taxes due or payable at this time.

There may be a supplemental assessment not covered by this "Tax Clearance Certificate" which may create an additional bill.

THIS CERTIFICATE IS VOID ON AND AFTER SEPTEMBER 7, 2021.

Executed on July 9, 2021 at Santa Ana.
Treasurer-Tax Collector for Orange County, State of California.

Issued on July 9, 2021

(Signature)

EXHIBIT 6



DTN: 12339739

Decal: LBM1081

Unit ID: 252606085

Trans Type: L/O Addition

Trans Date: 08/10/2021

Trade Name: CUSTOM VILLA

Serial #: AC7V710394GA, AC7V710394GB

Insignia # PFS1130281, PFS1130282

Status Date: 08/11/2021 User Name: CRUZ, SYLVIA

I hereby certify that this copy is a true and correct copy of
the original document on file with the Department of
Housing & Community Development.

A handwritten signature in black ink, appearing to be 'Sylvia Cruz', written over a horizontal line.

Signature

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model		DOM	DFS	RY
90002 SKYLINE HOMES INC	CUSTOM VILLA			05/29/2014	07/28/2014	
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Aug 03, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

Addressee

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Registered Owner(s)

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

I hereby certify that this copy is a true and correct copy of
the original document on file with the Department of
Housing & Community Development.



Signature

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

12339139

SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____ City _____ State _____

Signature

Printed Name

SECTION B - RELEASING SIGNATURES

1a. _____ Date of Release _____
Releasing Signature of Registered Owner

1b. _____ Date of Release _____
Releasing Signature of Registered Owner

2. _____ ☐ Release ☐ Retain ☐ Assign Interest
Legal Owner of Record (if any) sign and check appropriate box (* If Assign Interest is checked - Complete New Legal Owner Below)

SECTION C - NEW OWNER INFORMATION

NEW REGISTERED OWNER - Please Print or Type Clearly

3a. _____ New Registered Owners Name
3c. _____ New Registered Owners Name

3b. _____ New Registered Owners Name
3d. _____ New Registered Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)

4. _____ Mailing Address of New Registered Owner
City/State _____ Zip Code _____

5. _____ Actual Location Address of Unit
City/State _____

6. _____ Purchase Price or check box if Gift-☐ Purchase Date or Transfer Date _____

7a. _____ Signature of New Registered Owners
7c. _____ Signature of New Registered Owners

7b. _____ Signature of New Registered Owners
7d. _____ Signature of New Registered Owners

NEW LEGAL OWNER - Please Print or Type Clearly

8a. _____ New Legal Owners Name
8b. _____ New Legal Owners Name

If more than one New Lender going onto title, please check the appropriate Co-owner term box below.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)

9. _____ Mailing Address of New Legal Owner
City/State _____ Zip Code _____

NEW JUNIOR LIENHOLDER - Please Print or Type Clearly

10a. _____ New Junior Lienholder Name
10b. _____ New Junior Lienholder Name

11. _____ Mailing Address of New Junior Lienholder
City/State _____ Zip Code _____

SECTION D - RELEASE OF DEALERS

12. _____ Signature of Selling Dealer
Print Dealers Name and Dealer Number _____

I hereby certify that this copy is a true and correct copy of the original document on file with the Department of Housing & Community Development.



Signature

Case 8:23-ap-01064-SC Doc 76 Filed 04/05/24 Entered 04/05/24 17:59:04 Desc
 STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
 REGISTRATION CARD

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Aug 03, 2021	

Addressee

JAMIE LYNN GALLIAN
 16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649



Registered Owner(s)

JAMIE LYNN GALLIAN
 16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
 HUNTINGTON BEACH, CA 92649

ATTENTION OWNER:

THIS IS THE REGISTRATION CARD FOR THE
 UNIT DESCRIBED ABOVE. PLEASE KEEP THIS
 CARD IN A SAFE PLACE WITHIN THE UNIT.

INSTRUCTIONS FOR RENEWAL:

REGISTRATION FOR THIS UNIT EXPIRES ON THE
 DATE INDICATED ABOVE IN THE BOX LABELED
 "Exp. Date". THERE ARE SUBSTANTIAL
 PENALTIES FOR DELINQUENCY. IF YOU DO NOT
 RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS
 PRIOR TO THE EXPIRATION DATE, CONTACT
 H.C.D. FOR RENEWAL INSTRUCTIONS:

I hereby certify that this copy is a true and correct copy of
 the original document on file with the Department of
 Housing & Community Development.

Signature

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
 DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
 CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

08032021 - 1

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):	Trade Name:	Serial No.(s):
LBM1081	CUSTOM VILLA	AC7V710394GB/GA

I/We, the undersigned, hereby state:

Jamie L. Gallian, say that J-Pad, LLC is the Legal Owner and perfected their lien 1/14/2019. ★

The correct Address for the Legal Owner - J-Pad LLC
21742 Anza Ave, Torrance, CA 90503

I hereby certify that this copy is a true and correct copy of
the original document on file with the Department of
Housing & Community Development.

Signature

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 8/6/2021 at Huntington Beach, CA
Date City State

Signature(s): 	Printed name(s): Jamie Lynn Gallian
-------------------	--

Address 16222 Monterey Ln #376
City Huntington Beach State CA 92649

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT TO ENCUMBER

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES-CUSTOM VILLA

The Serial Number(s) is: AC7V710394GB; AC7V710394GA

SECTION II. LEGAL OWNER INFORMATION

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

J-PAD, LLC - SOS ENTITY NO. 201804010750

(Name of New Legal Owner)

Address: 2702 N. GAFF STREET ORANGE, CA 92865
Street Address or P.O. Box City State Zip

SECTION III. CERTIFICATION

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 1/14/2019 at HUNTINGTON BEACH, CALIFORNIA, CO. OF ORANGE
Date City State

Signature of each registered owner:

J-Pad, LLC, its Member

Printed name of each registered owner:

J-SANDCASTLE CO LLC

Address: 16222 MONTEREY LN 376 HUNTINGTON BEACH, CA 92649
Street Address or P.O. Box City State Zip

HCD 484.7 (Rev. 11/14)

I hereby certify that this copy is a true and correct copy of the original document on file with the Department of Housing and Community Development.

[Signature]
Signature

EXHIBIT 7



STATE OF CALIFORNIA
Office of the Secretary of State
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File #: U210084251426

Date Filed: 9/12/2021

Submitter Information:

Contact Name Ron Pierpont; Bob McLelland, its Managers
Organization Name J-Pad, LLC
Phone Number (909) 202-3145
Email Address ronpierpont@gmail.com
Address 4519 Ponderosa Way
Yorba Linda, CA 92886

Amendment Action Information:

Initial Financing Statement File Number 197691916827
Date Filed 01/14/2019
Amendment Action Secured Party Amendment
Secured Party Action Add Secured Party

Add Secured Party:

Secured Party Name	Mailing Address
Steven D. Gallian	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
Brian J. Gallian	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
Justin D. Barclay	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
Ronald J. Pierpont	4519 PONDEROSA WAY YORBA LINDA, CA 92886
Robert J. McLelland	21742 ANZA AVENUE TORRANCE, CA 90503
Jamie L. Gallian	16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649
EJ Gallian	BRIAN J. GALLIAN 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

J-Pad, LLC Ronald J. Pierpont and Robert J. McLelland, It's Managers

Miscellaneous Information:

B0428-8874 09/12/2021 10:11 AM Received by California Secretary of State

This is a Secured Party Amendment to U197691916827 filed 1/14/2019, adding all Secured Parties, as individuals who have a defined percentage interest in the collateral known as LBM1081, A.P.N. 891-569-62, 2014 Skyline Custom Villa, Serial No. 7V710394GB/GA, located on APN 178-011-16, Lot 376, 16222 Monterey Lane Huntington Beach, CA 92649. to mirror the Secured Parties listed in U197691905279, filed 1/14/2019 and its Amendments therein. J-Pad, LLC will continue to be the Legal Owner listed on the COT and Note and entity who Manages the collateral for all Secured Parties.

B0428-8875 09/12/2021 10:11 AM Received by California Secretary of State



STATE OF CALIFORNIA
Office of the Secretary of State
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File #: U210084255728

Date Filed: 9/12/2021

Submitter Information:

Contact Name Ronald Pierpont or Robert Mclelland, its Managers
Organization Name J--Pad, LLC
Phone Number (714) 742-5999
Email Address bobwentflying@yahoo.com
Address 4519 Ponderosa Way
Yorba Linda, CA 92886

Amendment Action Information:

Initial Financing Statement File Number 197691905279
Date Filed 01/14/2019
Amendment Action Secured Party Amendment
Secured Party Action Edit Secured Party

Edit Secured Party:

Secured Party Name	Mailing Address
<p><i>Changed From:</i> JUSTIN D. BARCLAY</p> <p><i>Changed To:</i> JUSTIN D. BARCLAY</p>	<p><i>Changed From:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625</p> <p><i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625</p>
<p><i>Changed From:</i> BRIAN J GALLIAN</p> <p><i>Changed To:</i> BRIAN J. GALLIAN</p>	<p><i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625</p>
<p><i>Changed From:</i> E. J. GALLIAN</p> <p><i>Changed To:</i> E. J. GALLIAN</p>	<p><i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> BRIAN J. GALLIAN 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625</p>
<p><i>Changed From:</i> STEVEN D GALLIAN</p> <p><i>Changed To:</i> STEVEN D. GALLIAN</p>	<p><i>Changed From:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625</p> <p><i>Changed To:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625</p>
<p><i>Changed From:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750</p> <p><i>Changed To:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750</p>	<p><i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 92503</p>

B0428-8950 09/12/2021 9:27 PM Received by California Secretary of State

<p><i>Changed From:</i> ROBERT MCLELLAND</p> <p><i>Changed To:</i> ROBERT MCLELLAND</p>	<p><i>Changed From:</i> 21742 ANZA AVENUE TORRANCE, CA 90503</p> <p><i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 90503</p>
<p><i>Changed From:</i> RONALD J. PIERPONT</p> <p><i>Changed To:</i> RONALD J. PIERPONT</p>	<p><i>Changed From:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886 HUTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886</p>

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:

This is a Secured Party Amendment to U197691916827 and U197691905279, Filed on 1/14/2019. and Amendment filed 12/4/2020 U200034803831. This filing secures the personal property collateral to the Secured Parties herein, known as LBM1081, LPT APN 891-569-62, 2014 Skyline Custom Villa the primary residence of Jamie Lynn Gallian. Homestead Declaration filed 7/9/2021 @ 12:48 p.m. Clerk Recorder County of Orange. HCD Registration transferred from J-Sandcastle Co LLC perfected on 2/25/2021. J-Pad, LLC holder of Certificate of Title perfected with HCD 1/14/2019, a manager-managed LLC. entity no. 201804010750.



STATE OF CALIFORNIA
Office of the Secretary of State
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File #: U210084256326

Date Filed: 9/12/2021

Submitter Information:

Contact Name Ronald J. Pierpont; Robert McLelland, its Managers
Organization Name J-Pad, LLC - CA SOS Entity No. 201804010750
Phone Number (714) 742-5999
Email Address ronpierpont@gmail.com
Address 21742 Anza Avenue
Torrance, CA 90503

Amendment Action Information:

Initial Financing Statement File Number 197691905279
Date Filed 01/14/2019
Amendment Action Secured Party Amendment
Secured Party Action Edit Secured Party

Edit Secured Party:

Secured Party Name	Mailing Address
<i>Changed From:</i> JUSTIN D. BARCLAY <i>Changed To:</i> JUSTIN D. BARCLAY	<i>Changed From:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> BRIAN J GALLIAN <i>Changed To:</i> BRIAN J GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> E. J. GALLIAN <i>Changed To:</i> E. J. GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> STEVEN D GALLIAN <i>Changed To:</i> STEVEN D GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625 <i>Changed To:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750 <i>Changed To:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750	<i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 90503

B0428-8959 09/13/2021 12:00 AM Received by California Secretary of State

<p><i>Changed From:</i> ROBERT MCLELLAND</p> <p><i>Changed To:</i> ROBERT MCLELLAND</p>	<p><i>Changed From:</i> 21742 ANZA AVENUE TORRANCE, CA 90503</p> <p><i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 90503</p>
<p><i>Changed From:</i> RONALD J. PIERPONT</p> <p><i>Changed To:</i> RONALD J. PIERPONT</p>	<p><i>Changed From:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886 HUTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886</p>

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:
PERSONAL PROPERTY LBM 1081, APN 891-569-62, SERIAL NUMBER 7V710394GB/GA LOCATED ON APN 178-011-16
16222 MONTEREY LN SPC 376 HUNTINGTON BEACH, CA 92649



STATE OF CALIFORNIA
Office of the Secretary of State
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File #: U210088103629

Date Filed: 9/24/2021

Submitter Information:

Contact Name Jamie Gallian
Organization Name
Phone Number (714) 321-3449
Email Address JAMIEGALLIAN@GMAIL.COM
Address 16222 Monterey Ln. #376
Huntington Beach, CA 92649

Amendment Action Information:

Initial Financing Statement File Number 197691905279
Date Filed 01/14/2019
Amendment Action Secured Party Amendment
Secured Party Action Add Secured Party

Add Secured Party:

Secured Party Name	Mailing Address
J-PAD, LLC	21742 ANZA AVENUE TORRANCE, CA 90503
STEVEN D. GALLIAN	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
BRIAN J. GALLIAN	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
JUSTIN D. BARCLAY	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
RONALD J. PIERPONT	4519 PONDEROSA WAY YORBA LINDA, CA 92886
ROBERT J. MCLELLAND	21742 ANZA AVENUE TORRANCE, CA 90503
EJ GALLIAN	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625

Name of Secured Party of Record Authorizing This Amendment:

☒ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Debtor Name JAMIE LYNN GALLIAN

Optional Filer Reference Information:

Miscellaneous Information:

This is a Debtor Amendment acknowledging reaffirming the Initial UCC Financing Statement 19-7691905279 filed 1/14/2019, and Amendment filed U20003480383 filed 12/4/2020. The individual secured parties listed have a defined percentage interest in the collateral known as LBM1081, APN 891-569-62, located on APN 178-011-01, Tract 10542 Unit 4, Lot 376. J-Pad, LLC a manager managed LLC will continue to be the Legal Owner listed on the COT and Holder. J-Pad, LLC will continue to manage the collateral for all Secured Parties.



STATE OF CALIFORNIA
Office of the Secretary of State, Alex Padilla
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File #: U200034803831

Date Filed: 12/4/2020

Submitter Information:

Contact Name

Organization Name

Phone Number

Email Address

Address

None

Amendment Action Information:

Initial Financing Statement File Number

197691905279

Date Filed

01/14/2019

Amendment Action

Secured Party Amendment

Secured Party Action

Add Secured Party

Add Secured Party:

Secured Party Name	Mailing Address
Steven D Gallian	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649
Brian J Gallian	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name

J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:

B0349-4529 12/04/2020 2:14 PM Received by California Secretary of State



STATE OF CALIFORNIA
Office of the Secretary of State
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File #: U210083394336

Date Filed: 9/8/2021

Submitter Information:

Contact Name

Organization Name

Phone Number

Email Address

Address

None

Amendment Action Information:

Initial Financing Statement File Number

197691905279

Date Filed

01/14/2019

Amendment Action

Secured Party Amendment

Secured Party Action

Add Secured Party

Add Secured Party:

Secured Party Name	Mailing Address
RONALD J. PIERPONT	4519 PONDEROSA WAY YORBA LINDA, CA 92886 HUNTINGTON BEACH, CA 92649
ROBERT MCLELLAND	21742 ANZA AVENUE TORRANCE, CA 90503
JUSTIN D. BARCLAY	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649
E. J. GALLIAN	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name

J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:

B0428-3050 09/08/2021 3:22 PM Received by California Secretary of State



STATE OF CALIFORNIA
Office of the Secretary of State
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File #: U210083400018

Date Filed: 9/8/2021

Submitter Information:

Contact Name

Organization Name

Phone Number

Email Address

Address

None

Amendment Action Information:

Initial Financing Statement File Number

197691905279

Date Filed

01/14/2019

Amendment Action

Secured Party Amendment

Secured Party Action

Edit Secured Party

Edit Secured Party:

Secured Party Name	Mailing Address
<p><i>Changed From:</i> JUSTIN D. BARCLAY</p> <p><i>Changed To:</i> JUSTIN D. BARCLAY</p>	<p><i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625</p>
<p><i>Changed From:</i> BRIAN J GALLIAN</p> <p><i>Changed To:</i> BRIAN J GALLIAN</p>	<p><i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649</p>
<p><i>Changed From:</i> E. J. GALLIAN</p> <p><i>Changed To:</i> E. J. GALLIAN</p>	<p><i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649</p>
<p><i>Changed From:</i> STEVEN D GALLIAN</p> <p><i>Changed To:</i> STEVEN D GALLIAN</p>	<p><i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625</p>
<p><i>Changed From:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750</p> <p><i>Changed To:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750</p>	<p><i>Changed From:</i> 2702 N GAFF STREET ORANGE, CA 92865</p> <p><i>Changed To:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649</p>

Name of Secured Party of Record Authorizing This Amendment:

B0428-3116 09/08/2021 3:41 PM Received by California Secretary of State

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:

B0428-3117 09/08/2021 3:41 PM Received by California Secretary of State

EXHIBIT 8

Fill in this information to identify the case:

Debtor 1 JAMIE LYNN GALLIAN

Debtor 2
(Spouse, if filing) _____

United States Bankruptcy Court for the: Central District of California

Case number 8:21-bk-11710-SC

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>The Huntington Beach Gables Homeowners Association</u> <small>Name of the current creditor (the person or entity to be paid for this claim)</small> Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <u>Robert P. Goe / Goe Forsythe & Hodges LLP</u> <small>Name</small> <u>17701 Cowan Ave, Suite 210</u> <small>Number Street</small> <u>Irvine CA 92614</u> <small>City State ZIP Code</small> Contact phone <u>949-798-2460</u> Contact email <u>rgoe@goeforlaw.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) <u>Huntington Beach Gables Homeowners Assn.</u> <small>Name</small> <u>c/o Goe Forsythe & Hodges, 17701 Cowan Ave</u> <small>Number Street</small> <u>Suite 210, Irvine CA 92610</u> <small>City State ZIP Code</small> Contact phone <u>949-798-2460</u> Contact email <u>rgoe@goeforlaw.com</u>
4. Does this claim amend one already filed?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Claim number on court claims registry (if known) <u>Claim 1</u> Filed on <u>07/05/2022</u> <small>MM / DD / YYYY</small>	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: <u>3</u> <u>9</u> <u>3</u> <u>6</u>
7. How much is the claim?	At least \$553,774.84 (not including additional interest, fees and other costs) \$ <u>553,774.84</u> . Does this amount include interest or other charges? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Judgments, delinquent assessments, other charges</u>
9. Is all or part of the claim secured?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input checked="" type="checkbox"/> Other. Describe: <u>Abstracts of judgment, ORAP lien</u> Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ <u>Unknown</u> Amount of the claim that is secured: \$ <u>Unknown</u> Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/25/2022
MM / DD / YYYY

/s/ Robert P. Goe

Signature

Print the name of the person who is completing and signing this claim:

Name Robert P. Goe
First name Middle name Last name

Title Attorney

Company Goe Forsythe & Hodges LLP
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 17701 Cowan Avenue, Suite 210
Number Street

Irvine CA 92614
City State ZIP Code

Contact phone (949) 798-2460 Email rgoe@goeforlaw.com

Creditor: Huntington Beach Gables Homeowners Association
 Claim Itemization under FRBP 3001(c)(2)
 October 25, 2022

Claim 1 - Table of Judgment in favor of The Huntington Beach Gables Homeowners Association against Debtor Jamie Lynn Gallian

OCSC Case Number	Case Name	Date of Abstract	Dollar Amount	Number of Pages
30-2017-00962999	The Huntington Beach Gables HOA v. Gallian	4/30/2019	\$9265; plus 10% per annum from 03/21/19, which is the date of court ordered judgment	4 pages
Total Amount			\$12,590.25	

Claim 2 - Table of Judgment in favor of The Huntington Beach Gables Homeowners Association against Debtor Jamie Lynn Gallian

OCSC Case Number	Case Name	Date of Abstract	Dollar Amount	Number of Pages
30-2017-00913985	The Huntington Beach Gables HOA v. Bradley, Gallian, et al.	5/14/2019	\$319,653.59; plus 10% per annum. Note, Item 8a of this abstract includes two judgments in one: first, the OC court's judgment order issued against Debtor for court's sanctions on 09/27/18 and the related abstract issued on 11/16/18 in the amount of \$3070.00; second, the court's judgment amount of \$316,583.59 issued on 5/6/2019 and related abstract issued on 5/14/19	12 pages
Total Amount			\$430,535.95	

Claim 3 - Table of Debtor's Unpaid Legal Fees, Assessments and Fines Owed to The Huntington Beach Gables Homeowners Association by Debtor, Jamie Lynn Gallian

Dates of Unpaid Legal Fees, Delinquent Assessments, and Fines	Account number	Dollar Amount including Interest from date of assessment	
02/20/18	HOA account #21776	\$6,785.22; \$5300.50 unpaid special assessment plus 6% interest per annum	
2018 OC Recorder's Office Fees	HOA account #21776	\$680.00	
Fines for Violations of the CC&Rs	HOA account #21776	\$23,140	
Unpaid monthly HOA dues	HOA account #21776	\$1,586.90 (\$1292.00 for 4 months of unpaid monthly assessments plus 6% interest per annum)	
The Huntington Beach Gables HOA v. Nickel, Gallian, et al., OCSC Case No. 30-2020-01163055	State court UVTA case re transfer of Debtor's condo to Nickel	\$78,456.52, legal fees and costs (ongoing UVTA state court litigation so additional legal fees and costs in the future)	
Total Amount		\$110,648.64	

Grand Total: \$553,774.84

RECORDING REQUESTED BY:

THE HUNTINGTON BEACH GABLES
HOMEOWNERS ASSOCIATION

WHEN RECORDED MAIL TO:

THE HUNTINGTON BEACH GABLES
HOMEOWNERS ASSOCIATION
Epsten Grinnell & Howell, APC
10200 Willow Creek Road, Suite 100
San Diego, CA 92131-1138

Recorded in Official Records, Orange County
Hugh Nguyen, Clerk-Recorder



103.00

* \$ R 0 0 1 0 8 1 1 4 2 8 \$ *

2019000148568 4:19 pm 05/03/19

105 417 A03 4

0.00 0.00 0.00 0.00 9.00 10.00 0.000.0075.00 3.00

Title:

ABSTRACT OF JUDGMENT

THE HUNTINGTON BEACH GABLES HOMEOWNERS ASSOCIATION

v.

JAMIE LYNN GALLIAN

30-2017-00962999-CU-HR-CJC

TT
40
FF
101
SB
CF

EJ-001	
<div style="border: 1px solid black; padding: 2px;"><small>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):</small> After recording, return to: Joyce J. Kapsal/Pejman D. SBN: 091950/279260 EPSTEN GRINNELL & HOWELL, APC 10200 WILLOW CREEK ROAD, SUITE 100, SAN DIEGO, CA 92131 TEL NO. 858-527-0111 FAX NO. (optional): 858-527-1531 E-MAIL ADDRESS (Optional): jkapsal@epsten.com <div style="display: flex; justify-content: space-between;"><input checked="" type="checkbox"/> ATTORNEY FOR<input checked="" type="checkbox"/> JUDGMENT CREDITOR<input type="checkbox"/> ASSIGNEE OF RECORD</div></div>	
<div style="border: 1px solid black; padding: 2px;"><small>SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE</small> STREET ADDRESS: 700 Civic Center Drive W091950/es/ MAILING ADDRESS: 700 Civic Center Drive West CITY AND ZIP CODE: Santa Ana, CA 92701-4045 BRANCH NAME: Central Justice Center</div>	
<small>FOR RECORDER'S USE ONLY</small>	
PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Jamie Lynn Gallian	CASE NUMBER 30-2017-00962999-CU-HR-CJC
<div style="border: 1px solid black; padding: 2px;">ABSTRACT OF JUDGMENT—CIVIL AND SMALL CLAIMS <input type="checkbox"/> Amended</div>	
<div style="display: flex;"><div style="flex: 1;"><p>1. The <input checked="" type="checkbox"/> judgment creditor <input type="checkbox"/> assignee of record applies for an abstract of judgment and represents the following:</p><p>a. Judgment debtor's</p><div style="border: 1px solid black; padding: 5px; margin-left: 20px;">Name and last known address Jamie L. Gallian 16222 Monterey Lane, #376 Huntington Beach, CA 92649</div><p>b. Driver's license no. [last 4 digits] and state: 0742/CA <input type="checkbox"/> Unknown</p><p>c. Social security no. [last 4 digits]: xx-xx-3936 <input type="checkbox"/> Unknown</p><p>d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address): Jamie L. Gallian, 16222 Monterey Lane, #376 Huntington Beach, CA 92649</p><p>2. <input type="checkbox"/> Information on additional judgment debtors is shown on page 2.</p><p>3. Judgment creditor (name and address): The Huntington Beach Gables Homeowners Association C/o Epsten Grinnell & Howell, 10200 Willow Creek Road, San Diego, CA 92131 Date: April 3, 2019 Joyce J. Kapsal <small>(TYPE OR PRINT NAME)</small></p></div><div style="flex: 1; border: 1px solid black; padding: 5px; margin-left: 10px;"><small>FOR COURT USE ONLY</small> Pursuant to California Government Code § 68150(f), the Clerk of the Court hereby certifies this document accurately reflects the official court record. The electronic signature and seal on this document have the same validity and legal force and effect as an original clerk's signature and court seal. California Government Code § 68150(g).</div></div>	
<div style="display: flex; justify-content: space-between;"><div style="width: 48%;"><p>6. Total amount of judgment as entered or last renewed: \$ 9265.00</p><p>7. All judgment creditors and debtors are listed on this abstract.</p><p>8. a. Judgment entered on (date): March 21, 2019 b. Renewal entered on (date):</p><p>9. <input type="checkbox"/> This judgment is an installment judgment.</p></div><div style="width: 48%;"><p>4. <input type="checkbox"/> Information on additional judgment creditors is shown on page 2.</p><p>5. <input type="checkbox"/> Original abstract recorded in this county:</p><p>a. Date:</p><p>b. Instrument No.: </p><p style="text-align: right;"><small>(SIGNATURE OF APPLICANT OR ATTORNEY)</small></p><p>10. <input type="checkbox"/> An <input type="checkbox"/> execution lien <input type="checkbox"/> attachment lien is endorsed on the judgment as follows: a. Amount: \$ b. In favor of (name and address):</p><p>11. A stay of enforcement has a. <input checked="" type="checkbox"/> not been ordered by the court. b. <input type="checkbox"/> been ordered by the court effective until (date):</p><p>12. a. <input checked="" type="checkbox"/> I certify that this is a true and correct abstract of the judgment entered in this action. b. <input type="checkbox"/> A certified copy of the judgment is attached.</p></div></div>	
<div style="display: flex; align-items: center;"><div style="flex: 1;"><div style="border: 1px solid black; padding: 5px; margin-top: 10px;">This abstract issued on (date): 04/30/2019</div></div><div style="flex: 1; text-align: center;"><p>David H. Yamasaki, Clerk of the Court</p><p>Clerk, by Deputy</p></div></div>	

PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Jamie Lynn Gallian	COURT CASE NO.: 30-2017-00962999-CU-HR-CJC
--	---

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (*name and address*):

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

☐ ☐

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

17. Name and last known address

☐ ☐

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

☐ ☐

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

☐ ☐

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

POS-050/EFS-050	
<p>ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 91950/ 279260</p> <p>NAME: Joyce J. Kapsal / Pejman D. Kharrazian, Esq.</p> <p>FIRM NAME: EPSTEN GRINNELL & HOWELL, APC</p> <p>STREET ADDRESS: 10200 WILLOW CREEK ROAD, SUITE 100</p> <p>CITY: SAN DIEGO STATE: CA ZIP CODE: 92131</p> <p>TELEPHONE NO.: 858-527-0111 FAX NO: 858-527-1531</p> <p>E-MAIL ADDRESS: jkapsal@epsten.com / pkharrazian@epsten.com</p> <p>ATTORNEY FOR (name): Huntington Beach Gables Homeowners Association</p>	<p>FOR COURT USE ONLY</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE</p> <p>STREET ADDRESS: 700 Civic Center Drive West</p> <p>MAILING ADDRESS: 700 Civic Center Drive West</p> <p>CITY AND ZIP CODE: Santa Ana, CA 92701</p> <p>BRANCH NAME: Central Justice Center</p>	<p>CASE NUMBER:</p> <p>2017-00962999-CU-HR-CJC</p>
<p>PLAINTIFF/PETITIONER: The Huntington Beach Gables Homeowners Association</p> <p>DEFENDANT/RESPONDENT: Jamie L. Gallian</p>	<p>JUDICIAL OFFICER:</p> <p>Hon. Sherri Honer</p>
<p>PROOF OF ELECTRONIC SERVICE</p>	<p>DEPARTMENT:</p> <p>C-66</p>

1. I am at least 18 years old.
 - a. My residence or business address is (specify): 10200 Willow Creek Road, Suite 100, San Diego, CA 92131
 - b. My electronic service address is (specify): shart@epsten.com
2. I electronically served the following documents (exact titles): Abstract of Judgment – Civil and Small Claims

☐ The documents served are listed in an attachment. (Form POS-050(D)/EFS-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

- a. Name of person served: Steven A. Fink

On behalf of (name or names of parties represented, if person served is an attorney):

Jamie L. Gallian

- b. Electronic service address of person served : sfink@stevefinklaw.com

- c. On (date): April 19, 2019

☐ The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment. (Form POS-050(P)/EFS-050(P) may be used for this purpose.)

Date: April 19, 2019

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.


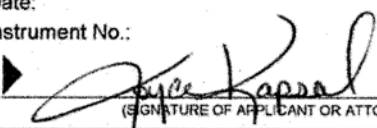


Stephanie Hart

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

4B

EJ-001	
Recording Requested by and When Recorded Mail to Joyce J. Kapsal / Pejman D. SBN: 091950 / 279260 EPSTEN GRINNELL & HOWELL, APC 10200 Willow Creek Road, Suite 100 San Diego, CA 92131 TEL NO.: 858-527-0111 FAX NO. (optional): 858-527-1531 E-MAIL ADDRESS (Optional): jkapsal@epsten.com / <input checked="" type="checkbox"/> ATTORNEY FOR <input checked="" type="checkbox"/> JUDGMENT CREDITOR <input type="checkbox"/> ASSIGNEE OF RECORD	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: 700 Civic Center Drive West CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center	
Recorded in Official Records, Orange County Hugh Nguyen, Clerk-Recorder  90.00 * \$ R 0 0 1 0 8 3 8 3 3 9 \$ * 2019000165259 12:56 pm 05/16/19 48 401 A03 3 0.00 0.00 0.00 0.00 6.00 0.00 0.000.0075.00 3.00	
<small>FOR RECORDER'S USE ONLY</small>	
PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Sandra Bradley, et al.	CASE NUMBER 30-2017-00913985-CU-CO-CJC
ABSTRACT OF JUDGMENT—CIVIL AND SMALL CLAIMS <input checked="" type="checkbox"/> Amended	
<div style="border: 1px solid black; padding: 5px; float: right; width: 250px;">FOR COURT USE ONLY Pursuant to California Government Code § 68150(f), the Clerk of the Court hereby certifies this document accurately reflects the official court record. The electronic signature and seal on this document have the same validity and legal force and effect as an original clerk's signature and court seal. California Government Code § 68150(g).</div> <div style="clear: both;"></div> <p>1. The <input checked="" type="checkbox"/> judgment creditor <input type="checkbox"/> assignee of record applies for an abstract of judgment and represents the following: a. Judgment debtor's Name and last known address Jamie L. Gallian 4476 Alderport Drive #53 Huntington Beach, CA 92649 b. Driver's license no. [last 4 digits] and state: 0742 / CA <input type="checkbox"/> Unknown c. Social security no. [last 4 digits]: xxx-xx-3936 <input type="checkbox"/> Unknown d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address): 4476 Alderport Drive #53, Huntington Beach, CA 92649</p> <p>2. <input type="checkbox"/> Information on additional judgment debtors is shown on page 2.</p> <p>3. Judgment creditor (name and address): The Huntington Beach Gables Homeowners Association c/o Epsten Grinnell & Howell, 10200 Willow Creek Rd, Ste 100, San Diego, CA 92131 Date: May 8, 2019 Joyce J. Kapsal <small>(TYPE OR PRINT NAME)</small></p> <p>4. <input type="checkbox"/> Information on additional judgment creditors is shown on page 2.</p> <p>5. <input type="checkbox"/> Original abstract recorded in this county: a. Date: b. Instrument No.:  <small>(SIGNATURE OF APPLICANT OR ATTORNEY)</small></p> <p>6. Total amount of judgment as entered or last renewed: \$ 319,653.59</p> <p>7. All judgment creditors and debtors are listed on this abstract.</p> <p>8. a. Judgment entered on (date): 5/6/2019 [9/27/2018 sanctions] b. Renewal entered on (date):</p> <p>9. <input type="checkbox"/> This judgment is an installment judgment.</p> <p>10. <input type="checkbox"/> An <input type="checkbox"/> execution lien <input type="checkbox"/> attachment lien is endorsed on the judgment as follows: a. Amount: \$ b. In favor of (name and address):</p> <p>11. A stay of enforcement has a. <input checked="" type="checkbox"/> not been ordered by the court. b. <input type="checkbox"/> been ordered by the court effective until (date):</p> <p>12. a. <input checked="" type="checkbox"/> I certify that this is a true and correct abstract of the judgment entered in this action. b. <input type="checkbox"/> A certified copy of the judgment is attached.</p> <div style="text-align: right;">Mary M Johnson Deputy</div>	
<div style="display: flex; align-items: center;"><div style="text-align: center;"> <small>(SEAL)</small></div><div style="margin-left: 20px;">David H. Yamasaki, Clerk of the Court <div style="border: 1px solid black; padding: 5px; display: inline-block;">This abstract issued on (date): May 14, 2019</div></div></div> <div style="text-align: right; margin-top: 10px;">Clerk, by </div>	

11
20
08
FF
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PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Sandra Bradley, et al.	COURT CASE NO.: 30-2017-00913985-CU-CO-CJC
--	---

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (name and address):

14. Judgment creditor (name and address):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

20. ☐ Continued on Attachment 20.

POS-050/EFS-050	
ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 118830/ 091950 NAME: Rian W. Jones, Esq. / Joyce J. Kapsal, Esq. FIRM NAME: EPSTEN GRINNELL & HOWELL, APC STREET ADDRESS: 10200 WILLOW CREEK ROAD, SUITE 100 CITY: SAN DIEGO STATE: CA ZIP CODE: 92131 TELEPHONE NO.: 858-527-0111 FAX NO.: 858-527-1531 E-MAIL ADDRESS: rjones@epsten.com / jkapsal@epsten.com ATTORNEY FOR (name): The Huntington Beach Gables Homeowners Association	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: 700 Civic Center Drive West CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center	CASE NUMBER: 30-2017-00913985-CU-CO-CJC
PLAINTIFF/PETITIONER: The Huntington Beach Gables Homeowners Association DEFENDANT/RESPONDENT: Sandra Bradley, et al.	JUDICIAL OFFICER: Hon. James L. Crandall
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: C-33

1. I am at least 18 years old.

a. My residence or business address is (specify): 10200 Willow Creek Road, Suite 100, San Diego, CA 92131

b. My electronic service address is (specify): dmorrow@epsten.com

2. I electronically served the following documents (exact titles):

ABSTRACT OF JUDGMENT

☐ The documents served are listed in an attachment. (Form POS-050(D)/EFS-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

a. Name of person served: Steven A. Fink

On behalf of (name or names of parties represented, if person served is an attorney):

Jamie L. Gallian

b. Electronic service address of person served : sfink@stevefinklaw.com

c. On (date): May 8, 2019

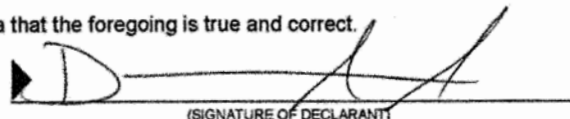
☐ The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment.
(Form POS-050(P)/EFS-050(P) may be used for this purpose.)

Date: May 8, 2019

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dominique Morrow

(TYPE OR PRINT NAME OF DECLARANT)


(SIGNATURE OF DECLARANT)

Page 1 of 1

Certified Copy of document

THIS IS A CERTIFIED COPY OF THE
RECORD IF IT BEARS THE SEAL, AND
SIGNATURE OF THE ORANGE
COUNTY CLERK-RECORDER.
DATE: 05/20/2019
CERTIFICATION FEE: 4.00



COUNTY CLERK-RECORDER

Hugh Nguyen

ORANGE COUNTY
STATE OF CALIFORNIA

Number 2019000165259

7

Recorded In Official Records, Orange County
Hugh Nguyen, Clerk-Recorder



97.00

* \$ R 0 0 1 0 4 8 0 4 9 1 \$ *

2018000435011 2:30 pm 11/19/18

7 413 A03 2

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EJ-001

Recording Requested by and When Recorded Mail to
Joyce J. Kapsal SBN: 091950
Epsten Grinnell & Howell, APC
10200 WILLOW CREEK ROAD, SUITE 100
SAN DIEGO, CA 92131
TEL NO: 858-527-0111 FAX NO (optional): 858-527-1531
E-MAIL ADDRESS (Optional):
☒ ATTORNEY ☒ JUDGE/IT ☐ ASSIGNEE
FOR CREDITOR OF RECORD
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE
STREET ADDRESS 700 Civic Center Drive West
MAILING ADDRESS: 700 Civic Center Drive West
CITY AND ZIP CODE: Santa Ana, CA 92701
BRANCH NAME Central Justice Center

FOR RECORDER'S USE ONLY

PLAINTIFF: The Huntington Beach Gables Homeowners Association
DEFENDANT: Jamie L. Gallian
CASE NUMBER
30-2017-00913985-CU-CO-CJC

ABSTRACT OF JUDGMENT—CIVIL
AND SMALL CLAIMS

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record
applies for an abstract of judgment and represents the following:
a. Judgment debtor's

Name and last known address

Jamie L. Gallian
4476 Alderport Drive #53
Huntington Beach, CA 92649

- b. Driver's license no. [last 4 digits] and state: 0742 / CA ☐ Unknown
c. Social security no. [last 4 digits]: xxx-xx-3936 ☐ Unknown
d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Jamie L. Gallian, 4476 Alderport Drive #53, Huntington Beach, CA 92649

Pursuant to California Government
Code § 68150(f), the Clerk of the
Court hereby certifies this document
accurately reflects the official court
record. The electronic signature and
seal on this document have the
same validity and legal force and
effect as an original clerk's
signature and court seal. California
Government Code § 68150(g).

2. ☐ Information on additional judgment debtors is
shown on page 2.
3. Judgment creditor (name and address):
The Huntington Beach Gables Homeowners Association
c/o Epsten Grinnell & Howell, 10200 Willow
Creek Rd, Ste 100, San Diego, CA 92131
Date: November 9, 2018

Joyce J. Kapsal

(TYPE OR PRINT NAME)

4. ☐ Information on additional judgment creditors is
shown on page 2.
5. ☐ Original abstract recorded in this county:

- a. Date:
b. Instrument No.:

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:
\$ 3,070.00
7. All judgment creditors and debtors are listed on this abstract.
8. a. Judgment entered on (date): 9/27/2018 [sanctions]
b. Renewal entered on (date):

10. ☐ An ☐ execution lien ☐ attachment lien
is endorsed on the judgment as follows:

- a. Amount: \$
b. In favor of (name and address):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has
a. ☒ not been ordered by the court.
b. ☐ been ordered by the court effective until
(date):



David H. Yamasaki, Clerk of the Court

This abstract issued on (date):
11/16/2018

12. a. ☒ I certify that this is a true and correct abstract of
the judgment entered in this action.
b. ☐ A certified copy of the judgment is attached.

Clerk, by
S. Wilson, Deputy

TT
30
FF
SB
PL

PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Jamie L. Gallian	COURT CASE NO.: 30-2017-00913985-CU-CO-CJC
--	---

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (*name and address*):

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

17. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

EJ-001

Recording Requested by and When Recorded Mail to
Joyce J. Kapsal / Pejman D. SBN: 091950 / 279260
EPSTEN GRINNELL & HOWELL, APC
10200 Willow Creek Road, Suite 100
San Diego, CA 92131
TEL NO. 858-527-0111 FAX NO. (optional) 858-527-1531
E-MAIL ADDRESS (Optional): jkapsal@epsten.com /
☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE
STREET ADDRESS: 700 Civic Center Drive West
MAILING ADDRESS: 700 Civic Center Drive West
CITY AND ZIP CODE: Santa Ana, CA 92701
BRANCH NAME: Central Justice Center

FOR RECORDER'S USE ONLY

PLAINTIFF: The Huntington Beach Gables Homeowners Association
DEFENDANT: Sandra Bradley, et al.

CASE NUMBER
30-2017-00913985-CU-CO-CJC

**ABSTRACT OF JUDGMENT—CIVIL
AND SMALL CLAIMS**

☒ Amended

FOR COURT USE ONLY

Pursuant to California Government Code § 68150(f), the Clerk of the Court hereby certifies this document accurately reflects the official court record. The electronic signature and seal on this document have the same validity and legal force and effect as an original clerk's signature and court seal. California Government Code § 68150(g).

1. The ☒ judgment creditor ☐ assignee of record applies for an abstract of judgment and represents the following:

a. Judgment debtor's
Name and last known address

Jamie L. Gallian
4476 Alderport Drive #53
Huntington Beach, CA 92649

- b. Driver's license no. [last 4 digits] and state: 0742 / CA ☐ Unknown
c. Social security no. [last 4 digits]: xxx-xx-3936 ☐ Unknown
d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):
4476 Alderport Drive #53, Huntington Beach, CA 92649

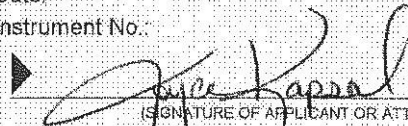
2. ☐ Information on additional judgment debtors is shown on page 2.
3. Judgment creditor (name and address):
The Huntington Beach Gables Homeowners Association
c/o Epsten Grinnell & Howell, 10200 Willow Creek Rd, Ste 100, San Diego, CA 92131
Date: May 8, 2019

4. ☐ Information on additional judgment creditors is shown on page 2.
5. ☐ Original abstract recorded in this county:

- a. Date:
b. Instrument No.:

Joyce J. Kapsal

(TYPE OR PRINT NAME)

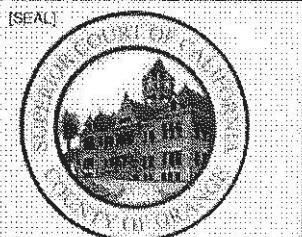

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:
\$ 319,653.59
7. All judgment creditors and debtors are listed on this abstract.
8. a. Judgment entered on (date): 5/6/2019 [9/27/2018 sanctions]
b. Renewal entered on (date):

10. ☐ An ☐ execution lien ☐ attachment lien is endorsed on the judgment as follows:
a. Amount \$
b. In favor of (name and address):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has
a. ☒ not been ordered by the court.
b. ☐ been ordered by the court effective until (date).
12. a. ☒ I certify that this is a true and correct abstract of the judgment entered in this action.
b. ☐ A certified copy of the judgment is attached.



David H. Yamasaki, Clerk of the Court

This abstract issued on (date):
May 14, 2019

Clerk, by



Mary M. Johnson
Deputy

PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Sandra Bradley, et al.	COURT CASE NO: 30-2017-00913985-CU-CO-CJC
--	--

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (*name and address*):

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

17. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state: ☐ Unknown

Social security no. [last 4 digits]: ☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

POS-050/EFS-050

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 118830/091950 NAME: Rian W. Jones, Esq. / Joyce J. Kapsal, Esq. FIRM NAME: EPSTEN GRINNELL & HOWELL, APC STREET ADDRESS: 10200 WILLOW CREEK ROAD, SUITE 100 CITY: SAN DIEGO STATE: CA ZIP CODE: 92131 TELEPHONE NO.: 858-527-0111 FAX NO.: 858-527-1531 E-MAIL ADDRESS: rjones@epsten.com / jkapsal@epsten.com ATTORNEY FOR (name): The Huntington Beach Gables Homeowners Association		FOR COURT USE ONLY	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: 700 Civic Center Drive West CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center		CASE NUMBER: 30-2017-00913985-CU-CO-CJC	
PLAINTIFF/PETITIONER: The Huntington Beach Gables Homeowners Association DEFENDANT/RESPONDENT: Sandra Bradley, et al.		JUDICIAL OFFICER: Hon. James L. Crandall	
PROOF OF ELECTRONIC SERVICE		DEPARTMENT: C-33	

1. I am at least 18 years old.

- a. My residence or business address is (specify): 10200 Willow Creek Road, Suite 100, San Diego, CA 92131
- b. My electronic service address is (specify): dmorrow@epsten.com

2. I electronically served the following documents (exact titles):

ABSTRACT OF JUDGMENT

☐ The documents served are listed in an attachment. (Form POS-050(D)/EFS-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

- a. Name of person served: Steven A. Fink
 On behalf of (name or names of parties represented, if person served is an attorney):

Jamie L. Gallian

- b. Electronic service address of person served: sfink@stevefinklaw.com

c. On (date): May 8, 2019

☐ The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment.
 (Form POS-050(P)/EFS-050(P) may be used for this purpose.)

Date: May 8, 2019

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dominique Morrow

(TYPE OR PRINT NAME OF DECLARANT)

(SIGNATURE OF DECLARANT)

Page 1 of 1

ELECTRONICALLY RECEIVED
Superior Court of California,
County of Orange
04/02/2019 at 09:43:37 AM
Clerk of the Superior Court
By Natasha Dorfman, Deputy Clerk

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

MAY 06 2019

DAVID H. YAMASAKI, Clerk of the Court

BY: _____, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

THE HUNTINGTON BEACH GABLES
HOMESOWNERS ASSOCIATION, a
California Nonprofit Mutual Benefit
Corporation,

Plaintiff,

v.

SANDRA L. BRADLEY, individually and
as Trustee of the Sandra L. Bradley Trust;
JAMIE L. GALLIAN, an individual; and
DOES 1 through 25, inclusive,

Defendants.

CASE NO. 37-2017-00913985-CU-CO-CJC

Judge: James L. Crandall
Dept.: C33

~~(PROPOSED)~~ JUDGMENT IN FAVOR OF
PLAINTIFF THE HUNTINGTON BEACH
GABLES HOMESOWNERS ASSOCIATION
AND AGAINST DEFENDANT JAMIE L.
GALLIAN

Complaint Filed: April 11, 2017
First Amended Complaint filed: May 16, 2017
Trial Date: September 9, 2019

In this action for Breach of Governing Documents (Architectural Violations) and
Nuisance Defendant Jamie L. Gallian was personally served with the Summons and Complaint
on May 24, 2017. Defendant Gallian filed an answer to the Complaint, and to the First
Amended Complaint. Subsequently, due to her failure to timely respond to discovery, on
February 13, 2019 the Court ordered that Defendant's Answer to the Plaintiff's First Amended
Complaint be stricken, and on February 13, 2019 entered the default against Defendant.
Pursuant to the Court's order of February 13, 2019, Plaintiff The Huntington Beach Gables
Homeowners Association has presented evidence of its costs for abating the nuisance caused by
Defendant Gallian, as alleged in the First Amended Complaint.

3000802v1

JUDGMENT IN FAVOR OF PLAINTIFF AND AGAINST DEFENDANT JAMIE L. GALLIAN

1 Upon the Application of Plaintiff, The Huntington Beach Gables Homeowners
2 Association for judgment against Defendant, and upon having reviewed the evidence and
3 declarations, and proof having been made to the satisfaction of this Court, the Court finds in
4 favor of Plaintiff, The Huntington Beach Gables Homeowners Association ("Association"), and
5 against Defendant, Jamie L. Gallian ("Defendant") on all causes of action in the First Amended
6 Complaint filed herein on May 16, 2017.

7 IT IS HEREBY ADJUDGED, ORDERED AND DECREED, as follows:

8 1. As to the First Cause of Action for Breach of Contract, the Court finds that
9 Defendant breached the Association's Governing Documents, including the "Declaration of
10 Covenants, Conditions and Restrictions for Huntington Beach Gables" containing the covenants,
11 conditions and restrictions which governing the properties located within the Association,
12 which was recorded on May 28, 1980, as Document No. 1980-28926 ("CC&Rs");

13 2. At all times mentioned herein, Defendant was the tenant of, resident of, and/or
14 claimed some interest in the condominium unit located within the Association commonly known
15 as 4476 Alderport Drive, Unit 53, Huntington Beach, CA 92649 ("Subject Property");

16 3. As a result of Defendant's breach of contract, Plaintiff's damages include the cost
17 of repairing damage to the Common Area caused by Defendant's failing to adhere to the
18 architectural guidelines and specifications with respect to the construction of the patio cover and
19 by constructing a concrete pad and installing an air conditioning unit on the exterior of
20 Defendant's Subject Property which encroached upon the Association's common area and
21 destroying the Association's landscaping;

22 4. As the Second Cause of Action for Nuisance, the Court finds that Defendant
23 created conditions on the Subject Property that are an annoyance and nuisance to the Association
24 and its residents, and as a result, the Association has incurred attorneys' fees and costs in
25 connection with abating the nuisance;

26 5. Plaintiff is entitled to recover its reasonable attorneys' fees and costs from
27 Defendant pursuant to Civil Code section 5975(e) and Article XIV, Section 14.7 of the
28 Association's CC&Rs;

3106902v1

2
JUDGMENT IN FAVOR OF PLAINTIFF AND AGAINST DEFENDANT JAMIE L. GALLIAN

1 6. Plaintiff is further entitled to recover its costs to repair damage to the Common
2 Area caused by unauthorized installation of the concrete pad and air conditioning unit, causing
3 extensive damage to the landscaping pursuant to the CC&Rs, Article XIV, Section 14.8 as well
4 as costs for removal of the concrete pad and landscaping repairs;

5 7. Association as Plaintiff, as the prevailing party in the action and pursuant to Civil
6 Code section 5975(o) and Article XIV, Section 14.7 of the Association's CC&Rs, shall recover
7 from Defendant its legal costs in the amount of \$ 10,693.12 and attorneys' fees in the amount of
8 \$ 178,362. Plaintiff shall also recover concrete removal and landscaping repair costs in the
9 amount of \$1,295.00;

10 8. Association as Cross-Defendant, as the prevailing party in the action and
11 pursuant to Civil Code section 5975(o) and Article XIV, Section 14.7 of the Association's
12 CC&Rs, shall recover from Cross-Complainant its legal costs in the amount of \$ 6,050.47
13 and attorneys' fees in the amount of \$ 120,183

14 9. Judgment is hereby entered in favor of Plaintiff The Huntington Beach Gables
15 Homeowners Association for recovery of its attorney's fees and costs, and costs for concrete
16 removal and landscaping repair costs, against Defendant Jamie L. Gallian, and Defendant is
17 ordered to pay said sums to Plaintiff;

18 10. Plaintiff The Huntington Beach Gables Homeowners Association is awarded
19 judgment in the total amount of \$ 316,583.59, which will accrue interest at the rate of
20 ten (10%) per annum from the date judgment is entered herein, until paid in full; and

21 11. Pursuant to Code of Civil Procedure §§ 685.040, 685.080, Defendant Jamie L.
22 Gallian shall pay to Plaintiff any and all sums reasonably incurred by Plaintiff in enforcing the
23 Judgment.

24 IT IS SO ORDERED.

25
26 Dated: 5-6-, 2019


The Honorable James L. Crandall
Judge of the Superior Court

EXHIBIT 9

Fill in this information to identify the case:

Debtor 1 Jamie Lynn Gallian

Debtor 2
(Spouse, if filing) _____

United States Bankruptcy Court for the: Central District of California

Case number 8:21-bk-11710-SC

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates</u> Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor _____		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____		
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <u>D. Edward Hays</u> Name <u>870 Roosevelt</u> Number Street <u>Irvine</u> <u>CA</u> <u>92620</u> City State ZIP Code Contact phone <u>(949) 333-7777</u> Contact email <u>ehays@marshackhays.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) <u>Houser Bros. Co. Attn: Chris Houser</u> Name <u>16222 Monterey Ln. OFC</u> Number Street <u>Huntington Beach</u> <u>CA</u> <u>92649</u> City State ZIP Code Contact phone <u>(714) 846-1429</u> Contact email <u>chouser@ranchodelreymhe.com</u>	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY		
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____		

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: <u>6</u> <u>2</u> <u>0</u> <u> </u>
7. How much is the claim?	\$ <u>280,927.63</u> . Does this amount include interest or other charges? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Damages for Trespass and Attorney's Fees. See Exs. A-E.</u>
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/25/2022
MM / DD / YYYY

/s/ D. Edward Hays

Signature

Print the name of the person who is completing and signing this claim:

Name D. EDWARD HAYS

First name

Middle name

Last name

Title

Partner

Company

MARSHACK HAYS LLP

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

870 Roosevelt

Number

Street

Irvine, CA 92620

City

State

ZIP Code

Contact phone

949-333-7777

Email

ehays@marshackhays.com

EXHIBIT A

Exhibit A - Houser Bros. Co. Proof of Claim Calculations

	Category of Charge	Amount	Exhibit
	Damages for lost use of lot	\$ 68,182.84	B
	Utility Charges	\$ 8,007.32	B
	Misc. Charges	\$ 30.00	B
Attorney's Fees and Costs Owed to Vivienne Alston from			
	Unlawful Detainer Action	\$ 69,384.58	C
Sanctions Awarded by Orange County Superior Court in Unlawful			
	Detainer Action	\$ 3,010.00	D
Attorney's Fees Paid to Marshack Hays LLP from Bankruptcy			
	Representation	\$ 132,312.89	E
	TOTAL	\$ 280,927.63	

EXHIBIT B

Lot Charges

Storage Charge:	\$68,182.84
Lot Charge Total:	\$68,182.84

Utility Charges

Electric Charge:	\$3,494.17
Gas Charge:	\$1,747.39
Water Charge:	\$1,225.59
Sewer:	\$682.31
Garbage Charge:	\$857.86
Utility Charge Total	\$8,007.32

MISC Charges	\$30.00
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Total Charges:	\$76,220.16
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Storage (Lot) Charges

			Total: \$68,182.84
Post Date	Charge Type	Comment	Amount
11/20/18	Storage Charge	Pro Rated Storage	\$486.84
12/01/18	Storage Charge	Home Storage 12/1-12/31	\$1,372.00
01/01/19	Storage Charge	January Storage	\$1,372.00
02/01/19	Storage Charge	February Storage	\$1,372.00
03/01/19	Storage Charge	March Storage	\$1,372.00
04/01/19	Storage Charge	April Storage	\$1,372.00
05/01/19	Storage Charge	Home Storage 5/1-5/31	\$1,372.00
06/01/19	Storage Charge	Home Storage 6/1-6/30	\$1,372.00
07/01/19	Storage Charge	Home Storage 7/1-7/31	\$1,372.00
08/01/19	Storage Charge	Home Storage 8/1-8/31	\$1,372.00
09/01/19	Storage Charge	Home Storage 9/1-9/30	\$1,372.00
10/01/19	Storage Charge	Home Storage 10/1-10/31	\$1,372.00
11/01/19	Storage Charge	Home Storage 11/1-11/30	\$1,372.00
12/01/19	Storage Charge	Home Storage 12/1-12/31	\$1,372.00
01/01/20	Storage Charge	Home Storage 1/1-1/31	\$1,420.00
02/01/20	Storage Charge	Home Storage 2/1-2/28	\$1,420.00
03/01/20	Storage Charge	Home Storage 3/1-3/31	\$1,420.00
04/01/20	Storage Charge	Home Storage 4/1-30	\$1,420.00
05/01/20	Storage Charge	Home Storage 5/1 -5/31	\$1,420.00
06/01/20	Storage Charge	Home Storage 6/1-6/30	\$1,420.00
07/01/20	Storage Charge	Home Storage 7/1-7/31	\$1,420.00
08/01/20	Storage Charge	Home Storage 8/1-8/31	\$1,420.00
09/01/20	Storage Charge	Home Storage 9/1-9/30	\$1,420.00
10/01/20	Storage Charge	Home Storage 10/1-10/31	\$1,420.00
11/01/20	Storage Charge	Home Storage 11/1-11/30	\$1,420.00
12/01/20	Storage Charge	Home Storage 12/1-12/31	\$1,420.00
01/01/21	Storage Charge	Home Storage 1/1-1/31	\$1,460.00
02/01/21	Storage Charge	Home Storage 2/1-2/28	\$1,460.00
03/01/21	Storage Charge	Home Storage 3/1-3/31	\$1,460.00
04/01/21	Storage Charge	Home Storage 4/1-4/30	\$1,460.00
05/01/21	Storage Charge	Home Storage 5/1-5/31	\$1,460.00
06/01/21	Storage Charge	Home Storage 6/1-6/30	\$1,460.00
07/01/21	Storage Charge	Home Storage 7/1-7/31	\$1,460.00
08/01/21	Storage Charge	Home Storage 8/1-8/31	\$1,460.00
09/01/21	Storage Charge	Home Storage 9/1-9/30	\$1,460.00
10/01/21	Storage Charge	Home Storage 10/1-10/31	\$1,460.00
11/01/21	Storage Charge	Home Storage 11/1-11/30	\$1,460.00
12/01/21	Storage Charge	Home Storage 12/1-12/31	\$1,460.00
01/01/22	Storage Charge	Home Storage 1/1 -1/31	\$1,530.00
02/01/22	Storage Charge	Home Storage 2/1-2/28	\$1,530.00
03/01/22	Storage Charge	Home Storage 3/1 - 3/31	\$1,530.00
04/01/22	Storage Charge	Home Storage 4/1 - 4/30	\$1,530.00
05/01/22	Storage Charge	Home Storage 5/1-5/31	\$1,530.00

06/01/22	Storage Charge	Home Storage 6/1-6/30	\$1,530.00
07/01/22	Storage Charge	Home Storage 7/1-7/31	\$1,530.00
08/01/22	Storage Charge	Home Storage 8/1-8/31	\$1,530.00
09/01/22	Storage Charge	Home Storage 9/1-9/30	\$1,530.00
10/01/22	Storage Charge	Home Storage 10/1-10/31	\$1,530.00

Electric Charges

Total: \$3,494.17

Posted Date	Charge Type	Comment	Amount
01/01/19	Elec Charge		\$87.24
02/01/19	Elec Charge		\$73.21
03/01/19	Elec Charge		\$72.52
04/01/19	Elec Charge		\$67.98
05/01/19	Elec Charge		\$40.83
06/01/19	Elec Charge		\$71.28
07/01/19	Elec Charge		\$80.39
08/01/19	Elec Charge		\$110.82
09/01/19	Elec Charge		\$99.08
10/01/19	Elec Charge		\$17.02
11/01/19	Elec Charge		\$95.61
12/01/19	Elec Charge		\$105.19
12/12/19	Elec Charge		\$73.89
02/01/20	Elec Charge		\$102.05
03/01/20	Elec Charge		\$77.77
04/01/20	Elec Charge		\$75.01
05/01/20	Elec Charge		\$21.12
06/01/20	Elec Charge		\$79.67
07/01/20	Elec Charge		\$73.16
08/01/20	Elec Charge		\$67.94
09/01/20	Elec Charge		\$97.45
10/01/20	Elec Charge		\$76.20
11/01/20	Elec Charge		\$93.83
12/01/20	Elec Charge		\$91.67
01/01/21	Elec Charge		\$63.07
02/01/21	Elec Charge		\$85.57
03/01/21	Elec Charge		\$65.65
04/01/21	Elec Charge		\$62.95
05/01/21	Elec Charge	Corrected CARE	\$29.88
06/01/21	Elec Charge	Corrected CARE	\$64.12
07/01/21	Elec Charge	Corrected CARE	\$54.22
08/01/21	Elec Charge	Corrected CARE	\$77.90
09/01/21	Elec Charge		\$87.47
10/01/21	Elec Charge		\$52.52
11/01/21	Elec Charge		\$34.96
12/01/21	Elec Charge		\$67.75
01/01/22	Elec Charge		\$59.34
02/01/22	Elec Charge		\$64.55
03/01/22	Elec Charge		\$39.12
04/01/22	Elec Charge		\$77.56
06/01/22	Elec Charge		\$47.37
07/01/22	Elec Charge		\$85.36
08/01/22	Elec Charge		\$98.64
09/01/22	Elec Charge		\$143.32

10/01/22	Elec Charge	\$148.10
10/13/22	Elec Charge	\$133.82

Gas Charges

Total: \$1,747.39

Post Date	Charge Type	Comment	Amount
01/01/19	Gas Charge		\$57.91
02/01/19	Gas Charge		\$83.97
03/01/19	Gas Charge		\$79.66
04/01/19	Gas Charge		\$32.28
06/01/19	Gas Charge		\$15.47
07/01/19	Gas Charge		\$38.73
08/01/19	Gas Charge		\$52.77
09/01/19	Gas Charge		\$12.56
10/01/19	Gas Charge		\$19.04
11/01/19	Gas Charge		\$29.64
12/01/19	Gas Charge		\$30.37
12/12/19	Gas Charge		\$22.88
02/01/20	Gas Charge		\$51.71
03/01/20	Gas Charge		\$38.79
04/01/20	Gas Charge		\$36.89
05/01/20	Gas Charge		\$14.19
06/01/20	Gas Charge		\$36.61
07/01/20	Gas Charge		\$46.06
08/01/20	Gas Charge		\$42.92
09/01/20	Gas Charge		\$47.43
10/01/20	Gas Charge		\$29.99
11/01/20	Gas Charge		\$38.25
12/01/20	Gas Charge		\$34.57
01/01/21	Gas Charge		\$21.95
02/01/21	Gas Charge		\$97.27
03/01/21	Gas Charge		\$71.17
04/01/21	Gas Charge		\$65.01
05/01/21	Gas Charge		\$44.82
06/01/21	Gas Charge		\$29.53
07/01/21	Gas Charge		\$17.85
08/01/21	Gas Charge		\$17.54
09/01/21	Gas Charge		\$13.23
10/01/21	Gas Charge		\$47.40
11/01/21	Gas Charge		\$54.63
12/01/21	Gas Charge		\$54.35
01/01/22	Gas Charge		\$45.78
02/01/22	Gas Charge		\$54.21
03/01/22	Gas Charge		\$32.61
04/01/22	Gas Charge		\$42.99
06/01/22	Gas Charge		\$23.37
07/01/22	Gas Charge		\$57.13
08/01/22	Gas Charge		\$10.73
09/01/22	Gas Charge		\$16.53

10/01/22	Gas Charge	\$17.23
10/13/22	Gas Charge	\$19.37

Water Charges

Total: \$1,225.59

Post Date	Charge Type	Comment	Amount
01/01/19	Water Charge		\$28.40
02/01/19	Water Charge		\$23.44
03/01/19	Water Charge		\$26.20
04/01/19	Water Charge		\$24.02
05/01/19	Water Charge		\$25.12
06/01/19	Water Charge		\$24.57
07/01/19	Water Charge		\$26.20
08/01/19	Water Charge		\$22.86
09/01/19	Water Charge		\$8.87
10/01/19	Water Charge		\$6.14
11/01/19	Water Charge		\$9.10
12/01/19	Water Charge		\$9.33
12/12/19	Water Charge		\$8.58
02/01/20	Water Charge		\$14.42
03/01/20	Water Charge		\$11.37
04/01/20	Water Charge		\$11.30
05/01/20	Water Charge		\$11.60
06/01/20	Water Charge		\$11.30
07/01/20	Water Charge		\$20.63
08/01/20	Water Charge		\$24.17
09/01/20	Water Charge		\$23.86
10/01/20	Water Charge		\$18.42
11/01/20	Water Charge		\$20.73
12/01/20	Water Charge		\$20.27
01/01/21	Water Charge		\$16.10
02/01/21	Water Charge		\$28.09
03/01/21	Water Charge		\$20.73
04/01/21	Water Charge		\$19.80
05/01/21	Water Charge		\$11.09
06/01/21	Water Charge		\$26.76
07/01/21	Water Charge		\$46.88
08/01/21	Water Charge		\$55.88
09/01/21	Water Charge		\$41.38
10/01/21	Water Charge		\$41.38
11/01/21	Water Charge		\$48.82
12/01/21	Water Charge		\$50.10
01/01/22	Water Charge		\$42.66
02/01/22	Water Charge		\$36.72
03/01/22	Water Charge		\$20.87
04/01/22	Water Charge		\$41.29
05/01/22	Water Charge		\$37.13
06/01/22	Water Charge		\$29.21
07/01/22	Water Charge		\$42.97

08/01/22	Water Charge	\$23.20
09/01/22	Water Charge	\$37.13
10/01/22	Water Charge	\$37.99
10/13/22	Water Charge	\$38.51

Garbage Charges

			Total: \$857.86
Post Date	Charge Type	Comment	Amount
01/01/19	Garbage Charge	Republic Services	\$17.67
02/01/19	Garbage Charge	Republic Services	\$17.67
03/01/19	Garbage Charge	Republic Services	\$17.67
04/01/19	Garbage Charge	Republic Services	\$17.67
05/01/19	Garbage Charge	Republic Services	\$17.67
06/01/19	Garbage Charge	Republic Services	\$17.67
07/01/19	Garbage Charge	Republic Services	\$18.01
08/01/19	Garbage Charge	Republic Services	\$18.64
09/01/19	Garbage Charge	Republic Services	\$18.64
10/01/19	Garbage Charge	Republic Services	\$18.64
11/01/19	Garbage Charge	Republic Services	\$18.64
12/01/19	Garbage Charge	Republic Services	\$18.64
01/01/20	Garbage Charge	Republic Services	\$18.64
02/01/20	Garbage Charge	Republic Services	\$18.64
03/01/20	Garbage Charge	Republic Services	\$18.64
04/01/20	Garbage Charge	Republic Services	\$18.64
05/01/20	Garbage Charge	Republic Services	\$18.64
06/01/20	Garbage Charge	Republic Services	\$18.64
07/01/20	Garbage Charge	Republic Services	\$18.64
08/01/20	Garbage Charge	Republic Services	\$21.99
09/01/20	Garbage Charge	Republic Services	\$19.27
10/01/20	Garbage Charge	Republic Services	\$18.65
11/01/20	Garbage Charge	Republic Services	\$18.65
12/01/20	Garbage Charge	Republic Services	\$19.33
01/01/21	Garbage Charge	Republic Services	\$19.33
02/01/21	Garbage Charge	Republic Services	\$18.23
03/01/21	Garbage Charge	Republic Services	\$18.23
04/01/21	Garbage Charge	Republic Services	\$18.89
05/01/21	Garbage Charge	Republic Services	\$18.32
06/01/21	Garbage Charge	Republic Services	\$19.55
07/01/21	Garbage Charge	Republic Services	\$18.05
08/01/21	Garbage Charge	Republic Services	\$19.45
09/01/21	Garbage Charge	Republic Services	\$18.21
10/01/21	Garbage Charge	Republic Services	\$18.28
11/01/21	Garbage Charge	Republic Services	\$18.21
12/01/21	Garbage Charge	Republic Services	\$18.21
01/01/22	Garbage Charge	Republic Services	\$18.21
02/01/22	Garbage Charge	Republic Services	\$18.21
03/01/22	Garbage Charge	Republic Services	\$18.21
04/01/22	Garbage Charge	Republic Services	\$19.26
05/01/22	Garbage Charge	Republic Services	\$18.21
06/01/22	Garbage Charge		\$18.73
07/01/22	Garbage Charge		\$18.21

08/01/22	Garbage Charge	Republic Services	\$20.49
09/01/22	Garbage Charge	Republic Services	\$19.87
10/01/22	Garbage Charge	Trash Service	\$19.90

Sewer Charges

			Total: \$682.31
Post Date	Charge Type	Comment	Amount
01/01/19	Sewer Charges	HB Sewer Charge	\$9.42
01/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
02/01/19	Sewer Charges	HB Sewer Charge	\$9.42
02/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
03/01/19	Sewer Charges	HB Sewer Charge	\$9.42
03/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
04/01/19	Sewer Charges	HB Sewer Charge	\$9.42
04/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
05/01/19	Sewer Charges	HB Sewer Charge	\$9.42
05/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
06/01/19	Sewer Charges	HB Sewer Charge	\$9.42
06/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
07/01/19	Sewer Charges	HB Sewer Charge	\$9.42
07/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
08/01/19	Sewer Charges	HB Sewer	\$8.59
08/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
09/01/19	Sewer Charges	HB Sewer	\$8.59
09/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
10/01/19	Sewer Charges	HB Sewer	\$8.59
10/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
11/01/19	Sewer Charges	HB Sewer	\$8.59
11/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
12/01/19	Sewer Charges	HB Sewer	\$8.59
12/01/19	Sewer Charges	OCSD Sewer Charge	\$13.96
01/01/20	Sewer Charges	HB Sewer	\$8.59
01/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
02/01/20	Sewer Charges	HB Sewer	\$8.59
02/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
03/01/20	Sewer Charges	HB Sewer	\$8.59
03/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
04/01/20	Sewer Charges	HB Sewer	\$8.59
04/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
05/01/20	Sewer Charges	HB Sewer	\$8.59
05/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
06/01/20	Sewer Charges	HB Sewer	\$8.59
06/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
07/01/20	Sewer Charges	HB Sewer	\$8.59
07/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
08/01/20	Sewer Charges	HB Sewer	\$8.59
08/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
09/01/20	Sewer Charges	HB Sewer	\$8.59
09/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
10/01/20	Sewer Charges	HB Sewer	\$8.59
10/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96

11/01/20	Sewer Charges	HB Sewer	\$8.59
11/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
12/01/20	Sewer Charges	HB Sewer	\$8.59
12/01/20	Sewer Charges	OCSD Sewer Charge	\$13.96
01/01/21	Sewer Charges	HB Sewer	\$8.59
01/01/21	Sewer Charges	OCSD Sewer Charge	\$13.96
02/01/21	Sewer Charges	HB Sewer	\$8.59
02/01/21	Sewer Charges	OCSD Sewer Charge	\$13.96
03/01/21	Sewer Charges	HB Sewer	\$8.59
03/01/21	Sewer Charges	OCSD Sewer Charge	\$13.96
04/01/21	Sewer Charges	HB Sewer	\$8.59
04/01/21	Sewer Charges	OCSD Sewer Charge	\$13.96
05/01/21	Sewer Charges	HB Sewer	\$8.59
05/01/21	Sewer Charges	OCSD Sewer Charge	\$13.96
06/01/21	Sewer Charges	HB Sewer	\$8.59
06/01/21	Sewer Charges	OCSD Sewer Charge	\$13.96

MISC Charges

			Total:	\$30.00
Post Date	Charge Type	Comment	Amount	
11/01/19	HCD Fee	Mobilehome Protection Act Fee	\$10.00	
01/01/21	HCD Fee	Mobilehome Protection Act Fee	\$10.00	
11/01/21	HCD Fee	Mobilehome Protection Act Fee	\$10.00	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

TO:

Gallian, Jamie
16222 Monterey Ln. SPC 376
Huntington Beach, CA 92649

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Last Payment	Amount Enclosed



PLEASE RETURN TOP PORTION WITH YOUR REMITTANCE

Date	Reference	Description	Amount
		Previous Balance	0.00
11/20/18		Storage Charge Pro Rated Storage	486.84
12/01/18		Storage Charge Home Storage 12/1-12/31	1,372.00
01/01/19		Electric Utility	87.24
	Readings:	Current: 12/18/18 - 9075 Previous: 11/16/18 - 8651 Usage: 424	
01/01/19		Water & Sewer	28.40
	Readings:	Current: 12/18/18 - 208464 Previous: 11/16/18 - 207914 Usage: 550	
01/01/19		Gas Utility	57.91
	Readings:	Current: 12/18/18 - 13030 Previous: 11/16/18 - 12580 Usage: 450	
01/01/19		Garbage Fee Republic Services	17.67
01/01/19		OCSD Sewer OCSD Sewer Charge	13.96
01/01/19		Sewer HB Sewer Charge	9.42
01/01/19		Storage Charge January Storage	1,372.00
02/01/19		Electric Utility	73.21
	Readings:	Current: 01/18/19 - 9441 Previous: 12/18/18 - 9075 Usage: 366	
02/01/19		Water & Sewer	23.44
	Readings:	Current: 01/18/19 - 208778 Previous: 12/18/18 - 208464 Usage: 314	
02/01/19		Gas Utility	83.97
	Readings:	Current: 01/18/19 - 13630 Previous: 12/18/18 - 13030 Usage: 600	
02/01/19		Garbage Fee Republic Services	17.67
02/01/19		OCSD Sewer OCSD Sewer Charge	13.96
02/01/19		Sewer HB Sewer Charge	9.42
02/01/19		Storage Charge February Storage	1,372.00
03/01/19		Electric Utility	72.52
	Readings:	Current: 02/19/19 - 9805 Previous: 01/18/19 - 9441 Usage: 364	
03/01/19		Water & Sewer	26.20
	Readings:	Current: 02/19/19 - 209148 Previous: 01/18/19 - 208778 Usage: 370	
03/01/19		Gas Utility	79.66
	Readings:	Current: 02/19/19 - 14220 Previous: 01/18/19 - 13630 Usage: 590	
03/01/19		Garbage Fee Republic Services	17.67
03/01/19		OCSD Sewer OCSD Sewer Charge	13.96

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
03/01/19		Sewer HB Sewer Charge	9.42
03/01/19		Storage Charge March Storage	1,372.00
04/01/19		Garbage Fee Republic Services	17.67
04/01/19		OCSD Sewer OCSD Sewer Charge	13.96
04/01/19		Sewer HB Sewer Charge	9.42
04/01/19		Storage Charge April Storage	1,372.00
04/01/19		Electric Utility	67.98
	Readings:	Current: 03/19/19 - 136 Previous: 02/19/19 - 9805 Usage: 331	
04/01/19		Gas Utility	32.28
	Readings:	Current: 03/19/19 - 14440 Previous: 02/19/19 - 14220 Usage: 220	
04/01/19		Water & Sewer	24.02
	Readings:	Current: 03/19/19 - 209526 Previous: 02/19/19 - 209148 Usage: 378	
05/01/19		Garbage Fee Republic Services	17.67
05/01/19		OCSD Sewer OCSD Sewer Charge	13.96
05/01/19		Sewer HB Sewer Charge	9.42
05/01/19		Storage Charge Home Storage 5/1-5/31	1,372.00
05/01/19		Electric Utility Edison Climate Credit	-33.00
05/01/19		Gas Utility SoCal Gas Climate Credit	-50.23
05/01/19		Electric Utility	73.83
	Readings:	Current: 04/18/19 - 491 Previous: 03/19/19 - 136 Usage: 355	
05/01/19		Gas Utility	34.37
	Readings:	Current: 04/18/19 - 14684 Previous: 03/19/19 - 14440 Usage: 244	
05/01/19		Water & Sewer	25.12
	Readings:	Current: 04/18/19 - 209931 Previous: 03/19/19 - 209526 Usage: 405	
06/01/19		Garbage Fee Republic Services	17.67
06/01/19		OCSD Sewer OCSD Sewer Charge	13.96
06/01/19		Sewer HB Sewer Charge	9.42
06/01/19		Storage Charge Home Storage 6/1-6/30	1,372.00
06/01/19		Electric Utility	71.28
	Readings:	Current: 05/17/19 - 834 Previous: 04/18/19 - 491 Usage: 343	
06/01/19		Gas Utility	31.33
	Readings:	Current: 05/17/19 - 14911 Previous: 04/18/19 - 14684 Usage: 227	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
06/01/19		Water & Sewer	24.57
	Readings:	Current: 05/17/19 - 210322 Previous: 04/18/19 - 209931 Usage: 391	
07/01/19		OCSD Sewer	13.96
07/01/19		Sewer	9.42
07/01/19		Garbage Fee	18.01
07/01/19		Storage Charge	1,372.00
07/01/19		Electric Utility	80.39
	Readings:	Current: 06/18/19 - 1212 Previous: 05/17/19 - 834 Usage: 378	
07/01/19		Gas Utility	38.73
	Readings:	Current: 06/18/19 - 15172 Previous: 05/17/19 - 14911 Usage: 261	
07/01/19		Water & Sewer	26.20
	Readings:	Current: 06/18/19 - 210754 Previous: 05/17/19 - 210322 Usage: 432	
08/01/19		OCSD Sewer	13.96
08/01/19		Garbage Fee	18.64
08/01/19		Sewer	8.59
08/01/19		Storage Charge	1,372.00
08/01/19		Electric Utility	110.82
	Readings:	Current: 07/31/19 - 1722 Previous: 06/18/19 - 1212 Usage: 510	
08/01/19		Gas Utility	52.77
	Readings:	Current: 07/31/19 - 15520 Previous: 06/18/19 - 15172 Usage: 348	
08/01/19		Water & Sewer	22.86
	Readings:	Current: 07/31/19 - 211335 Previous: 06/18/19 - 210754 Usage: 581	
09/01/19		OCSD Sewer	13.96
09/01/19		Garbage Fee	18.64
09/01/19		Sewer	8.59
09/01/19		Storage Charge	1,372.00
09/01/19		Electric Utility	99.08
	Readings:	Current: 08/27/19 - 2180 Previous: 07/31/19 - 1722 Usage: 458	
09/01/19		Gas Utility	12.56
	Readings:	Current: 08/27/19 - 1559 Previous: 07/31/19 - 1552 Usage: 7	
09/01/19		Water & Sewer	8.87
	Readings:	Current: 08/27/19 - 2116 Previous: 07/31/19 - 2113 Usage: 3	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
10/01/19		OCSD Sewer	OCSD Sewer Charge 13.96
10/01/19		Garbage Fee	Republic Services 18.64
10/01/19		Sewer	HB Sewer 8.59
10/01/19		Storage Charge	Home Storage 10/1-10/31 1,372.00
10/01/19		Electric Utility	SCE Climate Credit -33.00
10/01/19		Electric Utility	50.02
	Readings:	Current: 09/17/19 - 2429 Previous: 08/27/19 - 2180 Usage: 249	
10/01/19		Water & Sewer	6.14
	Readings:	Current: 09/17/19 - 2118 Previous: 08/27/19 - 2116 Usage: 2	
10/01/19		Gas Utility	19.04
	Readings:	Current: 09/17/19 - 1572 Previous: 08/27/19 - 1559 Usage: 13	
11/01/19		OCSD Sewer	OCSD Sewer Charge 13.96
11/01/19		Garbage Fee	Republic Services 18.64
11/01/19		Sewer	HB Sewer 8.59
11/01/19		Mobilehome Protection Act Fee	MH Residency Law Protection Act Fee 10.00
		*see below	
11/01/19		Storage Charge	Home Storage 11/1-11/30 1,372.00
11/01/19		Electric Utility	95.61
	Readings:	Current: 10/17/19 - 2880 Previous: 09/17/19 - 2429 Usage: 451	
11/01/19		Water & Sewer	9.10
	Readings:	Current: 10/17/19 - 2121 Previous: 09/17/19 - 2118 Usage: 3	
11/01/19		Gas Utility	29.64
	Readings:	Current: 10/17/19 - 1591 Previous: 09/17/19 - 1572 Usage: 19	
12/01/19		OCSD Sewer	OCSD Sewer Charge 13.96
12/01/19		Garbage Fee	Republic Services 18.64
12/01/19		Sewer	HB Sewer 8.59
12/01/19		Storage Charge	Home Storage 12/1-12/31 1,372.00
12/01/19		Electric Utility	105.19
	Readings:	Current: 11/19/19 - 3376 Previous: 10/17/19 - 2880 Usage: 496	
12/01/19		Water & Sewer	9.33
	Readings:	Current: 11/19/19 - 2124 Previous: 10/17/19 - 2121 Usage: 3	

Rancho Del Rey

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16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
12/01/19		Gas Utility	30.37
	Readings:	Current: 11/19/19 - 1612 Previous: 10/17/19 - 1591 Usage: 21	
12/12/19		Electric Utility	73.89
	Readings:	Current: 12/12/19 - 3724 Previous: 11/19/19 - 3376 Usage: 348	
12/12/19		Water & Sewer	8.58
	Readings:	Current: 12/12/19 - 2127 Previous: 11/19/19 - 2124 Usage: 3	
12/12/19		Gas Utility	22.88
	Readings:	Current: 12/12/19 - 1628 Previous: 11/19/19 - 1612 Usage: 16	
01/01/20		OCSD Sewer	13.96
01/01/20		Garbage Fee	18.64
01/01/20		Sewer	8.59
01/01/20		Storage Charge	1,420.00
02/01/20		OCSD Sewer	13.96
02/01/20		Garbage Fee	18.64
02/01/20		Sewer	8.59
02/01/20		Storage Charge	1,420.00
02/01/20		Electric Utility	102.05
	Readings:	Current: 01/21/20 - 4218 Previous: 12/12/19 - 3724 Usage: 494	
02/01/20		Water & Sewer	14.42
	Readings:	Current: 01/21/20 - 2132 Previous: 12/12/19 - 2127 Usage: 5	
02/01/20		Gas Utility	51.71
	Readings:	Current: 01/21/20 - 1662 Previous: 12/12/19 - 1628 Usage: 34	
03/01/20		OCSD Sewer	13.96
03/01/20		Garbage Fee	18.64
03/01/20		Sewer	8.59
03/01/20		Storage Charge	1,420.00
03/01/20		Electric Utility	77.77
	Readings:	Current: 02/20/20 - 4589 Previous: 01/21/20 - 4218 Usage: 371	
03/01/20		Water & Sewer	11.37
	Readings:	Current: 02/20/20 - 2136 Previous: 01/21/20 - 2132 Usage: 4	
03/01/20		Gas Utility	38.79
	Readings:	Current: 02/20/20 - 1687 Previous: 01/21/20 - 1662 Usage: 25	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
04/01/20		OCSD Sewer	OCSD Sewer Charge 13.96
04/01/20		Garbage Fee	Republic Services 18.64
04/01/20		Sewer	HB Sewer 8.59
04/01/20		Storage Charge	Home Storage 4/1-30 1,420.00
04/01/20		Gas Utility	36.89
	Readings:	Current: 03/20/20 - 1712 Previous: 02/20/20 - 1687 Usage: 25	
04/01/20		Electric Utility	75.01
	Readings:	Current: 03/20/20 - 4947 Previous: 02/20/20 - 4589 Usage: 358	
04/01/20		Water & Sewer	11.30
	Readings:	Current: 03/20/20 - 2140 Previous: 02/20/20 - 2136 Usage: 4	
05/01/20		OCSD Sewer	OCSD Sewer Charge 13.96
05/01/20		Garbage Fee	Republic Services 18.64
05/01/20		Sewer	HB Sewer 8.59
05/01/20		Storage Charge	Home Storage 5/1 -5/31 1,420.00
05/01/20		Electric Utility	Climate Credit applies to electric charges only. Any unapplied amount will be applied next month. -37.00
05/01/20		Gas Utility	Climate Credit applies to gas charges only. Any unapplied amount will be applied next month. -26.15
05/01/20		Electric Utility	87.12
	Readings:	Current: 04/22/20 - 5355 Previous: 03/20/20 - 4947 Usage: 408	
05/01/20		Water & Sewer	11.60
	Readings:	Current: 04/22/20 - 2144 Previous: 03/20/20 - 2140 Usage: 4	
05/01/20		Gas Utility	40.34
	Readings:	Current: 04/22/20 - 1740 Previous: 03/20/20 - 1712 Usage: 28	
06/01/20		OCSD Sewer	OCSD Sewer Charge 13.96
06/01/20		Garbage Fee	Republic Services 18.64
06/01/20		Sewer	HB Sewer 8.59
06/01/20		Storage Charge	Home Storage 6/1-6/30 1,420.00
06/01/20		Gas Utility	36.61
	Readings:	Current: 05/21/20 - 1765 Previous: 04/22/20 - 1740 Usage: 25	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
06/01/20		Electric Utility	79.67
	Readings:	Current: 05/21/20 - 5713 Previous: 04/22/20 - 5355 Usage: 358	
06/01/20		Water & Sewer	11.30
	Readings:	Current: 05/21/20 - 2148 Previous: 04/22/20 - 2144 Usage: 4	
07/01/20		OCSD Sewer	13.96
07/01/20		Garbage Fee	18.64
07/01/20		Sewer	8.59
07/01/20		Storage Charge	1,420.00
07/01/20		Electric Utility	-18.50
		SCE Climate Credit. Credit Only Applied to Electric Usage.	
07/01/20		Gas Utility	46.06
	Readings:	Current: 06/23/20 - 1793 Previous: 05/21/20 - 1765 Usage: 28	
07/01/20		Water & Sewer	20.63
	Readings:	Current: 06/23/20 - 2152 Previous: 05/21/20 - 2148 Usage: 4	
07/01/20		Electric Utility	91.66
	Readings:	Current: 06/23/20 - 6121 Previous: 05/21/20 - 5713 Usage: 408	
08/01/20		OCSD Sewer	13.96
08/01/20		Sewer	8.59
08/01/20		Garbage Fee	21.99
08/01/20		Storage Charge	1,420.00
08/01/20		Electric Utility	-18.50
		SCE Climate Credit. Credit Only Applied to Electric Usage.	
08/01/20		Gas Utility	42.92
	Readings:	Current: 07/24/20 - 1819 Previous: 06/23/20 - 1793 Usage: 26	
08/01/20		Water & Sewer	24.17
	Readings:	Current: 07/24/20 - 2156 Previous: 06/23/20 - 2152 Usage: 4	
08/01/20		Electric Utility	86.44
	Readings:	Current: 07/24/20 - 6504 Previous: 06/23/20 - 6121 Usage: 383	
09/01/20		OCSD Sewer	13.96
09/01/20		Sewer	8.59
09/01/20		Garbage Fee	19.27
09/01/20		Storage Charge	1,420.00

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
09/01/20		Gas Utility	47.43
	Readings:	Current: 08/28/20 - 1848 Previous: 07/24/20 - 1819 Usage: 29	
09/01/20		Electric Utility	97.45
	Readings:	Current: 08/28/20 - 6936 Previous: 07/24/20 - 6504 Usage: 432	
09/01/20		Water & Sewer	23.86
	Readings:	Current: 08/28/20 - 2159 Previous: 07/24/20 - 2156 Usage: 3	
10/01/20		OCSD Sewer	13.96
		OCSD Sewer Charge	
10/01/20		Sewer	8.59
		HB Sewer	
10/01/20		Garbage Fee	18.65
		Republic Services	
10/01/20		Storage Charge	1,420.00
		Home Storage 10/1-10/31	
10/01/20		Electric Utility	76.20
	Readings:	Current: 09/22/20 - 7268 Previous: 08/28/20 - 6936 Usage: 332	
10/01/20		Gas Utility	29.99
	Readings:	Current: 09/22/20 - 1867 Previous: 08/28/20 - 1848 Usage: 19	
10/01/20		Water & Sewer	18.42
	Readings:	Current: 09/22/20 - 2162 Previous: 08/28/20 - 2159 Usage: 3	
11/01/20		OCSD Sewer	13.96
		OCSD Sewer Charge	
11/01/20		Sewer	8.59
		HB Sewer	
11/01/20		Garbage Fee	18.65
		Republic Services	
11/01/20		Storage Charge	1,420.00
		Home Storage 11/1-11/30	
11/01/20		Electric Utility	93.83
	Readings:	Current: 10/22/20 - 7666 Previous: 09/22/20 - 7268 Usage: 398	
11/01/20		Gas Utility	38.25
	Readings:	Current: 10/22/20 - 1890 Previous: 09/22/20 - 1867 Usage: 23	
11/01/20		Water & Sewer	20.73
	Readings:	Current: 10/22/20 - 2165 Previous: 09/22/20 - 2162 Usage: 3	
12/01/20		OCSD Sewer	13.96
		OCSD Sewer Charge	
12/01/20		Sewer	8.59
		HB Sewer	
12/01/20		Garbage Fee	19.33
		Republic Services	
12/01/20		Storage Charge	1,420.00
		Home Storage 12/1-12/31	
12/01/20		Electric Utility	91.67
	Readings:	Current: 11/20/20 - 8051 Previous: 10/22/20 - 7666 Usage: 385	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
12/01/20		Water & Sewer	20.27
	Readings:	Current: 11/20/20 - 2168 Previous: 10/22/20 - 2165 Usage: 3	
12/01/20		Gas Utility	34.57
	Readings:	Current: 11/20/20 - 1912 Previous: 10/22/20 - 1890 Usage: 22	
01/01/21		Electric Utility	63.07
	Readings:	Current: 12/10/20 - 8316 Previous: 11/20/20 - 8051 Usage: 265	
01/01/21		Water & Sewer	16.10
	Readings:	Current: 12/10/20 - 2171 Previous: 11/20/20 - 2168 Usage: 3	
01/01/21		Gas Utility	21.95
	Readings:	Current: 12/10/20 - 1926 Previous: 11/20/20 - 1912 Usage: 14	
01/01/21		OCSD Sewer	13.96
01/01/21		Sewer	8.59
01/01/21		Garbage Fee	19.33
01/01/21		Mobilehome Protection Act Fee	10.00
		*see below	
01/01/21		Storage Charge	1,460.00
02/01/21		OCSD Sewer	13.96
02/01/21		Sewer	8.59
02/01/21		Garbage Fee	18.23
02/01/21		Storage Charge	1,460.00
02/01/21		Electric Utility	85.57
	Readings:	Current: 01/20/21 - 8689 Previous: 12/10/20 - 8316 Usage: 373	
02/01/21		Gas Utility	97.27
	Readings:	Current: 01/20/21 - 1991 Previous: 12/10/20 - 1926 Usage: 65	
02/01/21		Water & Sewer	28.09
	Readings:	Current: 01/20/21 - 2175 Previous: 12/10/20 - 2171 Usage: 4	
03/01/21		OCSD Sewer	13.96
03/01/21		Sewer	8.59
03/01/21		Garbage Fee	18.23
03/01/21		Storage Charge	1,460.00
03/01/21		Electric Utility	65.65
	Readings:	Current: 02/19/21 - 8962 Previous: 01/20/21 - 8689 Usage: 273	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
03/01/21		Gas Utility	71.17
	Readings:	Current: 02/19/21 - 2038 Previous: 01/20/21 - 1991 Usage: 47	
03/01/21		Water & Sewer	20.73
	Readings:	Current: 02/19/21 - 2178 Previous: 01/20/21 - 2175 Usage: 3	
04/01/21		OCSD Sewer	13.96
04/01/21		Sewer	8.59
04/01/21		Garbage Fee	18.89
04/01/21		Storage Charge	1,460.00
04/01/21		Electric Utility	62.95
	Readings:	Current: 03/19/21 - 9217 Previous: 02/19/21 - 8962 Usage: 255	
04/01/21		Gas Utility	65.01
	Readings:	Current: 03/19/21 - 2082 Previous: 02/19/21 - 2038 Usage: 44	
04/01/21		Water & Sewer	19.80
	Readings:	Current: 03/19/21 - 2181 Previous: 02/19/21 - 2178 Usage: 3	
05/01/21		Gas Utility	44.82
	Readings:	Current: 04/07/21 - 2112 Previous: 03/19/21 - 2082 Usage: 30	
05/01/21		Water & Sewer	11.09
	Readings:	Current: 04/07/21 - 2182 Previous: 03/19/21 - 2181 Usage: 1	
05/01/21		OCSD Sewer	13.96
05/01/21		Sewer	8.59
05/01/21		Garbage Fee	18.32
05/01/21		Storage Charge	1,460.00
05/01/21		Gas Utility	-22.39
05/01/21		Electric Utility	-29.00
05/01/21		Electric Utility	29.88
	Readings:	Current: 04/07/21 - 9390 Previous: 03/19/21 - 9217 Usage: 173	
06/01/21		OCSD Sewer	13.96
06/01/21		Sewer	8.59
06/01/21		Garbage Fee	19.55
06/01/21		Storage Charge	1,460.00

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
06/01/21		Gas Utility	29.53
	Readings:	Current: 05/20/21 - 2128 Previous: 04/07/21 - 2112 Usage: 16	
06/01/21		Water & Sewer	26.76
	Readings:	Current: 05/20/21 - 2185 Previous: 04/07/21 - 2182 Usage: 3	
06/01/21		Electric Utility	64.12
	Readings:	Current: 05/20/21 - 9761 Previous: 04/07/21 - 9390 Usage: 371	
07/01/21		Garbage Fee	18.05
07/01/21		Storage Charge	1,460.00
07/01/21		Gas Utility	17.85
	Readings:	Current: 06/22/21 - 2137 Previous: 05/20/21 - 2128 Usage: 9	
07/01/21		Water & Sewer	46.88
	Readings:	Current: 06/22/21 - 2188 Previous: 05/20/21 - 2185 Usage: 3	
07/01/21		Electric Utility	54.22
	Readings:	Current: 06/22/21 - 73 Previous: 05/20/21 - 9761 Usage: 312	
08/01/21		Garbage Fee	19.45
08/01/21		Storage Charge	1,460.00
08/01/21		Gas Utility	17.54
	Readings:	Current: 07/29/21 - 2145 Previous: 06/22/21 - 2137 Usage: 8	
08/01/21		Water & Sewer	55.88
	Readings:	Current: 07/29/21 - 2192 Previous: 06/22/21 - 2188 Usage: 4	
08/01/21		Electric Utility	77.90
	Readings:	Current: 07/29/21 - 515 Previous: 06/22/21 - 73 Usage: 442	
09/01/21		Electric Utility	87.47
	Readings:	Current: 08/25/21 - 975 Previous: 07/29/21 - 515 Usage: 460	
09/01/21		Gas Utility	13.23
	Readings:	Current: 08/25/21 - 2151 Previous: 07/29/21 - 2145 Usage: 6	
09/01/21		Water & Sewer	41.38
	Readings:	Current: 08/25/21 - 2195 Previous: 07/29/21 - 2192 Usage: 3	
09/01/21		Garbage Fee	18.21
09/01/21		Storage Charge	1,460.00
10/01/21		Garbage Fee	18.28
10/01/21		Storage Charge	1,460.00

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
10/01/21		Electric Utility	52.52
	Readings:	Current: 09/21/21 - 1274 Previous: 08/25/21 - 975 Usage: 299	
10/01/21		Gas Utility	47.40
	Readings:	Current: 09/21/21 - 2176 Previous: 08/25/21 - 2151 Usage: 25	
10/01/21		Water & Sewer	41.38
	Readings:	Current: 09/21/21 - 2198 Previous: 08/25/21 - 2195 Usage: 3	
11/01/21		Garbage Fee Republic Services	18.21
11/01/21		Mobilehome Protection Act Fee For information please visit: https://www.hcd.ca.gov/docs/ib2018-03.pdf	10.00
11/01/21		Storage Charge Home Storage 11/1-11/30	1,460.00
11/01/21		Electric Utility Climate Credit - Applied to Electric Charges	-29.00
11/01/21		Electric Utility	63.96
	Readings:	Current: 10/22/21 - 1618 Previous: 09/21/21 - 1274 Usage: 344	
11/01/21		Gas Utility	54.63
	Readings:	Current: 10/22/21 - 2204 Previous: 09/21/21 - 2176 Usage: 28	
11/01/21		Water & Sewer	48.82
	Readings:	Current: 10/22/21 - 2202 Previous: 09/21/21 - 2198 Usage: 4	
12/01/21		Garbage Fee Republic Services	18.21
12/01/21		Storage Charge Home Storage 12/1-12/31	1,460.00
12/01/21		Electric Utility	67.75
	Readings:	Current: 11/23/21 - 1973 Previous: 10/22/21 - 1618 Usage: 355	
12/01/21		Gas Utility	54.35
	Readings:	Current: 11/23/21 - 2233 Previous: 10/22/21 - 2204 Usage: 29	
12/01/21		Water & Sewer	50.10
	Readings:	Current: 11/23/21 - 2206 Previous: 10/22/21 - 2202 Usage: 4	
01/01/22		Garbage Fee Republic Services	18.21
01/01/22		Storage Charge Home Storage 1/1 -1/31	1,530.00
01/01/22		Electric Utility	59.34
	Readings:	Current: 12/21/21 - 2284 Previous: 11/23/21 - 1973 Usage: 311	
01/01/22		Gas Utility	45.78
	Readings:	Current: 12/21/21 - 2258 Previous: 11/23/21 - 2233 Usage: 25	

Rancho Del Rey

Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
01/01/22		Water & Sewer	42.66
	Readings:	Current: 12/21/21 - 2209 Previous: 11/23/21 - 2206 Usage: 3	
02/01/22		Garbage Fee Republic Services	18.21
02/01/22		Storage Charge Home Storage 2/1-2/28	1,530.00
02/01/22		Electric Utility	64.55
	Readings:	Current: 01/20/22 - 2617 Previous: 12/21/21 - 2284 Usage: 333	
02/01/22		Gas Utility	54.21
	Readings:	Current: 01/20/22 - 2285 Previous: 12/21/21 - 2258 Usage: 27	
02/01/22		Water & Sewer	36.72
	Readings:	Current: 01/20/22 - 2213 Previous: 12/21/21 - 2209 Usage: 4	
03/01/22		Electric Utility	39.12
	Readings:	Current: 02/07/22 - 2817 Previous: 01/20/22 - 2617 Usage: 200	
03/01/22		Gas Utility	32.61
	Readings:	Current: 02/07/22 - 2301 Previous: 01/20/22 - 2285 Usage: 16	
03/01/22		Water & Sewer	20.87
	Readings:	Current: 02/07/22 - 2215 Previous: 01/20/22 - 2213 Usage: 2	
03/01/22		Garbage Fee Republic Services	18.21
03/01/22		Storage Charge Home Storage 3/1 - 3/31	1,530.00
04/01/22		Garbage Fee Republic Services	19.26
04/01/22		Storage Charge Home Storage 4/1 - 4/30	1,530.00
04/01/22		Electric Utility	77.56
	Readings:	Current: 03/18/22 - 3200 Previous: 02/07/22 - 2817 Usage: 383	
04/01/22		Gas Utility	42.99
	Readings:	Current: 03/18/22 - 2323 Previous: 02/07/22 - 2301 Usage: 22	
04/01/22		Water & Sewer	41.29
	Readings:	Current: 03/18/22 - 2218 Previous: 02/07/22 - 2215 Usage: 3	
05/01/22		Garbage Fee Republic Services	18.21
05/01/22		Storage Charge Home Storage 5/1-5/31	1,530.00
05/01/22		Gas Utility Climate Credit - Applied to Current and Future Gas	-44.17
05/01/22		Electric Utility Climate Credit - Applied to Current and Future Elec	-59.00

Rancho Del Rey
Rancho Del Rey

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Statement

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

Date	Reference	Description	Amount
05/01/22		Electric Utility	70.56
	Readings:	Current: 04/21/22 - 3534 Previous: 03/18/22 - 3200 Usage: 334	
05/01/22		Gas Utility	35.63
	Readings:	Current: 04/21/22 - 2342 Previous: 03/18/22 - 2323 Usage: 19	
05/01/22		Water & Sewer	37.13
	Readings:	Current: 04/21/22 - 2221 Previous: 03/18/22 - 2218 Usage: 3	
06/01/22		Garbage Fee	18.73
06/01/22		Storage Charge Home Storage 6/1-6/30	1,530.00
06/01/22		Electric Utility	58.20
	Readings:	Current: 05/19/22 - 3809 Previous: 04/21/22 - 3534 Usage: 275	
06/01/22		Gas Utility	31.91
	Readings:	Current: 05/19/22 - 2358 Previous: 04/21/22 - 2342 Usage: 16	
06/01/22		Water & Sewer	29.21
	Readings:	Current: 05/19/22 - 2223 Previous: 04/21/22 - 2221 Usage: 2	
07/01/22		Garbage Fee	18.21
07/01/22		Storage Charge Home Storage 7/1-7/31	1,530.00
07/01/22		Electric Utility	85.36
	Readings:	Current: 06/29/22 - 4211 Previous: 05/19/22 - 3809 Usage: 402	
07/01/22		Gas Utility	57.13
	Readings:	Current: 06/29/22 - 2381 Previous: 05/19/22 - 2358 Usage: 23	
07/01/22		Water & Sewer	42.97
	Readings:	Current: 06/29/22 - 2226 Previous: 05/19/22 - 2223 Usage: 3	
08/01/22		Garbage Fee Republic Services	20.49
08/01/22		Storage Charge Home Storage 8/1-8/31	1,530.00
08/01/22		Electric Utility	98.64
	Readings:	Current: 07/19/22 - 4624 Previous: 06/29/22 - 4211 Usage: 413	
08/01/22		Gas Utility	10.73
	Readings:	Current: 07/19/22 - 2385 Previous: 06/29/22 - 2381 Usage: 4	
08/01/22		Water & Sewer	23.20
	Readings:	Current: 07/19/22 - 2228 Previous: 06/29/22 - 2226 Usage: 2	
09/01/22		Garbage Fee Republic Services	19.87
09/01/22		Storage Charge Home Storage 9/1-9/30	1,530.00

Statement

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Billing Period	Statement Date
11/01/18 - 10/14/22	10/14/22

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	620

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	76,620.10	399.94	76,220.16

[illegible]

Comments	

EXHIBIT C

ELAINE B. ALSTON
VIVIENNE J. ALSTON
DONALD A. DIEBOLD

ALSTON, ALSTON & DIEBOLD
ATTORNEYS AT LAW

TELEPHONE (714) 556-9400
FACSIMILE (714) 556-9500

27201 PUERTA REAL
SUITE 300
MISSION VIEJO, CALIFORNIA 92691

OUR FILE NO: 1510

STATEMENT OF ATTORNEY , VIVIENNE J. ALSTON

I am the attorney prosecuting the eviction of Debtor, JAMIE LYNN GALLIAN (GALLIAN), from the mobile home park known as RANCH DEL REY MOBILE ESTATES which is owned by HOUSER BROS.CO. (Orange County Superior Court Case Number 30-2019-01041423CL-UD-CJC). The eviction arose from GALLIAN's unauthorized occupation of a mobilehome lot located at 16222 Monterey Lane, Space 376, Huntington Beach, California 92649.

GALLIAN's company, J-Sandcastle, LLC, purchased the mobilehome from another resident, Ms. Lisa Ryan. Ms. Ryan was marketing the home for sale under a Stipulated Judgment reached in unlawful detainer action (Orange County Superior Court Case Number 3021801013582 CL-UD-CJC). The Stipulated Judgment called for specific conditions for the sale of the mobilehome. None of the terms of the Stipulated Judgment were followed and Ms. Ryan improperly transferred title to J-SANDCASTLE. After moving into the mobilehome, GALLIAN submitted an application for residency which was rejected as GALLIAN's credit rating was extremely poor, GALLIAN had a significant history of violence towards other residents at her prior tenancy, she was evicted from her prior tenancy due to a failure to comply with reasonable rules governing the condominium complex, as well as, other material falsehoods contained in her application.

As a result of Debtor's occupation of the mobilehome lot, HOUSER BROS.CO. incurred attorney fees and costs from November 2018 through the date of filing of the Bankruptcy by GALLIAN on July 9, 2022. During the pendency of the eviction action GALLIAN refused to comply with discovery requests resulting in multiple motions to compel discovery responses, and produced several false documents. She also engaged in multiple instances of harassing conduct towards other residents in the mobilehome park. All of these events required my office to

investigate and respond. Although GALLIAN and HOUSER BROS.CO. engaged in numerous settlement discussions, a voluntary settlement conference a mandatory settlement conference, a settlement was not reached. Debtor filed for bankruptcy protections shortly prior to a trial being set.

The attorney fees and costs incurred by HOUSER BROS.CO due to GALLIAN's occupation of the mobilehome lot resulted in attorney fees from November 18, 2018 through July 9, 2021, in the amount of \$64,866.50 and costs in the amount of \$4,518.08. An invoice reflecting these amounts is attached hereto.



Vivienne J Alston, Esq.

ALSTON, ALSTON & DIEBOLD

Attorneys at Law
27201 Puerta Real, Suite 300
Mission Viejo, CA 92691
714/556-9400

Invoice submitted to:

Rancho Del Rey
C/O Houser Brothers Co.
16222 Monterey Lane,
Park Office
Huntington Beach, CA 92647

Invoice 15507

Invoice date 10/25/2022

File No. 1510.201BK
In reference to:

**Rancho Del Rey v Jamie Gallian
Sp. 376 Re: 5 Day Complaint.**

Services Rendered Through: 10/25/2022

Previous balance	\$0.00
Payments and other transactions	\$0.00
Total fees	\$64,866.50
Total expenses	\$4,518.08
Interest	\$0.00
Finance charge	\$0.00
Taxes	\$0.00
Total new charges	\$69,384.58
Requested funds replenishment	\$0.00
Balance Due	\$69,384.58

Please detach this section and return it with your payment to ensure that your account is properly credited.

Rancho Del Rey
Client ID: 1510.201BK
In reference to:
**Rancho Del Rey v Jamie Gallian Sp. 376 Re: 5
Day Complaint.**

Invoice # 15507
Invoice date 10/25/2022
Check # _____

ALSTON, ALSTON & DIEBOLD
Attorneys at Law
27201 Puerta Real, Suite 300
Mission Viejo, CA 92691

Previous balance	\$0.00
Transactions	\$0.00
New charges	\$69,384.58
Funds replenishment	\$0.00
Balance due	\$69,384.58
Payment amount	\$ _____

EXHIBIT D

ASSIGNMENT OF CLAIM AGREEMENT

Alston, Alston & Diebold (“Assignor”), for good and valuable consideration, receipt of which is acknowledged by this present document, affirms the sale, transfer, and assignment from Assignor to Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates (“Assignee”), of all of Assignor’s rights, title, and interest, if any, in that certain sanctions award in the amount of \$3,010.00 awarded to Assignor on September 10, 2020, by the Orange County Superior Court, in Case No. 30-2019-01041423 CL-UD-CJC (“Assigned Claim”), including without limitation, the Assignor’s right to receive interest, penalties and fees, if any, which may be paid with respect to the Assigned Claim. A copy of the “MINUTE ORDER” regarding the Assigned Claim is attached hereto as **Exhibit A**. This transfer is an absolute and unconditional assignment of the Assigned Claim and is not for security.

Assignor acknowledges that, except as set forth in this Agreement, neither Assignee nor any agent or representative of Assignee has made any representation whatsoever to Assignor regarding the status of the Bankruptcy Estate in the Chapter 7 case of Jamie Lynn Gallian (“Debtor”), U.S. Bankruptcy Court, Central District of California, Case No. 8:21-bk-11710-SC (“Bankruptcy Case”), or any other matters regarding the Bankruptcy Case, Debtor, or the Assigned Claim. Assignor represents that it has adequate information concerning the Assigned Claim, the status of the Bankruptcy Case, and the Debtor to make an informed decision and that Assignor has not relied on any statements, representations, or documents provided by Assignee or any of its agents. Assignor further acknowledges and agrees that upon execution of this Agreement, Assignee, and only Assignee, may file a proof of claim in the Bankruptcy Case for recovery of the Assigned Claim.

The terms and benefits of this Agreement shall be binding and inure to the benefit of the Assignee, the Assignor, and their respective successors and assigns.

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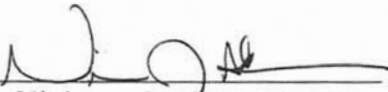
This Agreement is made and entered into under the laws of the State of California and Title 11 of the United States Code, and shall be interpreted, applied, and enforced under those laws. The Parties hereto agree that this Agreement shall be governed by the laws of the State of California and Title 11 of the United States Code, and any litigation concerning this Agreement shall be held in the jurisdiction of the United States Bankruptcy Court for the Central District of California, Santa Ana Division.

IN WITNESS WHEREOF, the undersigned have executed this Agreement on the date affixed by their signature.

THE PARTIES:

ASSIGNOR

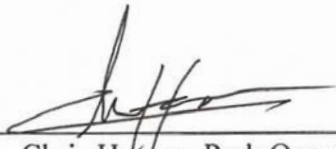
Alston, Alston & Diebold:

By: 
Name: Vivienne J. Alston, Partner

Date: 10/19/2022

ASSIGNEE

**Houser Bros. Co. DBA Rancho Del Rey
Mobile Home Estates**

By: 
Name: Chris Houser, Park Operations
Manager

Date: 10/24/22

**COUNTY OF ORANGE
CENTRAL JUSTICE CENTER**

MINUTE ORDER

DATE: 09/10/2020

TIME: 01:30:00 PM

DEPT: C62

JUDICIAL OFFICER PRESIDING: Kimberly A. Knill

CLERK: Brittany Gray

REPORTER/ERM: None

BAILIFF/COURT ATTENDANT: Ashlee Wilson

CASE NO: **30-2019-01041423-CL-UD-CJC** CASE INIT.DATE: 01/02/2019

CASE TITLE: **Houser Bros. Co. vs. Gallian**

CASE CATEGORY: Civil - Limited CASE TYPE: Unlawful Detainer - Residential

EVENT ID/DOCUMENT ID: 73365076

EVENT TYPE: Motion for Termination of Sanctions

MOVING PARTY: Houser Bros. Co.

CAUSAL DOCUMENT/DATE FILED: Motion for Terminating Sanctions, 08/31/2020

APPEARANCES

Vivienne Alston, from Alston, Alston & Diebold Attorneys at Law, present for Plaintiff(s).

James Casello, from Casello & Lincoln, present for Defendant(s).

Remote hearing held.

Motion for Order of Terminating Sanctions and for Monetary Sanctions in the Amount of \$3,010.00 Against Defendant Gallian and Her Counsel filed by Plaintiff is read and considered.

The Court having fully considered the arguments of all parties, both written and oral, as well as the evidence presented, now rules as follows:

Motion for order terminating sanctions is denied.

Plaintiff's request for monetary Sanctions is granted in the amount of \$3,010.00.

Sanctions to be paid by Defendant.

All dates to remain as set.

Court orders Clerk to give notice.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

Central Justice Center
700 W. Civic Center Drive
Santa Ana, CA 92702

SHORT TITLE: Houser Bros. Co. vs. Gallian

**CLERK'S CERTIFICATE OF MAILING/ELECTRONIC
SERVICE**

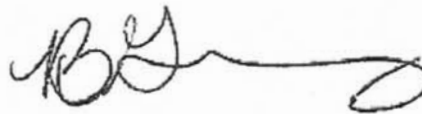
CASE NUMBER:
30-2019-01041423-CL-UD-CJC

I certify that I am not a party to this cause. I certify that the following document(s), Minute Order dated 09/10/20, have been transmitted electronically by Orange County Superior Court at Santa Ana, CA. The transmission originated from Orange County Superior Court email address on September 11, 2020, at 2:55:58 PM PDT. The electronically transmitted document(s) is in accordance with rule 2.251 of the California Rules of Court, addressed as shown above. The list of electronically served recipients are listed below:

ALSTON, ALSTON & DIEBOLD ATTORNEYS AT
LAW
DDIEBOLD@AADLAWYERS.COM

CASELLO & LINCOLN
JHCTLEX@YAHOO.COM

Clerk of the Court, by:



_____, Deputy

CLERK'S CERTIFICATE OF MAILING/ELECTRONIC SERVICE

EXHIBIT E

Bill and Payment Report

Houser Bros. Co. / Galian, Jamie Lynn (1673-001)

Case 8:21-bk-11710-SC Claim 3-1 Filed 10/25/22 Desc Main Document Page 46
Of 46

Last Payment (10/17/2022): 20,594.18

10/24/2022

Invoice Matter	Matter Description	Type	Date	Billed	Receipts	Adjustments	Late Charge	Total	Balance Status	Check No.	Check Date	Payor	Email
13042 001	Galian, Jamie Lynn	Invoice	09/14/2021	1,079.00	0.00	0.00	0.00	1,079.00	1,079.00 Paid				
13042 001	Galian, Jamie Lynn	Payment	09/21/2021	0.00	-1,079.00	0.00	0.00	0.00	0.00	7765	09/14/2021	Houser Bros. Co.	
13125 001	Galian, Jamie Lynn	Invoice	10/13/2021	767.00	0.00	0.00	0.00	767.00	767.00 Paid				
13125 001	Galian, Jamie Lynn	Payment	10/22/2021	0.00	-767.00	0.00	0.00	0.00	0.00	7779	10/13/2021	Houser Bros. Co.	
13210 001	Galian, Jamie Lynn	Invoice	11/16/2021	9,213.46	0.00	0.00	0.00	9,213.46	9,213.46 Paid				
13210 001	Galian, Jamie Lynn	Payment	12/01/2021	0.00	-9,213.46	0.00	0.00	0.00	0.00	7814	11/23/2021	Houser Bros. Co.	
13356 001	Galian, Jamie Lynn	Invoice	12/13/2021	7,539.20	0.00	0.00	0.00	7,539.20	7,539.20 Paid				
13356 001	Galian, Jamie Lynn	Payment	12/20/2021	0.00	-7,539.20	0.00	0.00	0.00	0.00	7828	12/13/2021	Houser Bros. Co.	
13673 001	Galian, Jamie Lynn	Invoice	01/14/2022	6,898.43	0.00	0.00	0.00	6,898.43	6,898.43 Paid				
13673 001	Galian, Jamie Lynn	Payment	01/24/2022	0.00	-6,898.43	0.00	0.00	0.00	0.00	7840	01/14/2022	Houser Bros. Co.	
13757 001	Galian, Jamie Lynn	Invoice	02/10/2022	5,373.99	0.00	0.00	0.00	5,373.99	5,373.99 Paid				
13757 001	Galian, Jamie Lynn	Payment	02/23/2022	0.00	-5,373.99	0.00	0.00	0.00	0.00	7854	02/10/2022	Houser Bros. Co.	
13839 001	Galian, Jamie Lynn	Invoice	03/04/2022	2,219.85	0.00	0.00	0.00	2,219.85	2,219.85 Paid				
13839 001	Galian, Jamie Lynn	Payment	03/23/2022	0.00	-2,219.85	0.00	0.00	0.00	0.00	7880	03/17/2022	Houser Bros. Co.	
14140 001	Galian, Jamie Lynn	Invoice	06/28/2022	32,644.49	0.00	0.00	0.00	32,644.49	32,644.49 Paid				
14140 001	Galian, Jamie Lynn	Payment	07/05/2022	0.00	-32,644.49	0.00	0.00	0.00	0.00	7962	06/28/2022	Houser Bros. Co.	
14209 001	Galian, Jamie Lynn	Invoice	07/06/2022	24,758.33	0.00	0.00	0.00	24,758.33	24,758.33 Paid				
14209 001	Galian, Jamie Lynn	Payment	08/08/2022	0.00	-24,758.33	0.00	0.00	0.00	0.00	7988	08/01/2022	Houser Bros. Co.	
14273 001	Galian, Jamie Lynn	Invoice	08/03/2022	21,224.96	0.00	0.00	0.00	21,224.96	21,224.96 Paid				
14273 001	Galian, Jamie Lynn	Payment	08/17/2022	0.00	-21,224.96	0.00	0.00	0.00	0.00	7996	08/10/2022	Houser Bros. Co.	
14351 001	Galian, Jamie Lynn	Invoice	09/06/2022	20,594.18	0.00	0.00	0.00	20,594.18	20,594.18 Paid				
14351 001	Galian, Jamie Lynn	Payment	10/17/2022	0.00	-20,594.18	0.00	0.00	0.00	0.00	8027	10/05/2022	Houser Bros. Co.	
Report Totals:				132,312.89	-132,312.89	0.00	0.00	0.00					

EXHIBIT 10

Fill in this information to identify the case:

Debtor 1 JAMIE LYNN GALLIAN

Debtor 2
(Spouse, if filing) _____

United States Bankruptcy Court for the: Central District of California

Case number 8:21-bk-11710-SC

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Janine Jasso, Jennifer Paulin, Lori Burrett, Lee Gragnano, Lindy Beck, and Ted Phillips</u> Name of the current creditor (the person or entity to be paid for this claim)		
	Other names the creditor used with the debtor _____		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____		
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <u>Robert P. Goe / Goe Forsythe & Hodges LLP</u> Name <u>17701 Cowan Ave, Suite 210</u> Number Street <u>Irvine</u> <u>CA</u> <u>92614</u> City State ZIP Code Contact phone <u>949-798-2460</u> Contact email <u>rgoe@goeforlaw.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) <u>Janine Jasso, Jennifer Paulin, et. al</u> Name <u>c/o Goe Forsythe & Hodges, 17701 Cowan Ave</u> Number Street <u>Suite 210, Irvine</u> <u>CA</u> <u>92614</u> City State ZIP Code Contact phone <u>949-798-2460</u> Contact email <u>rgoe@goeforlaw.com</u>	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY		
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____		

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☐ No
☒ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 3 9 3 6

7. How much is the claim? At least \$64,049.66 (not including additional interest, fees and other costs)
\$ 64,049.66. Does this amount include interest or other charges?
☐ No
☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.
Judgment

9. Is all or part of the claim secured? ☐ No
☒ Yes. The claim is secured by a lien on property.
Nature of property:
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☒ Other. Describe: Abstract of judgment
Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ Unknown
Amount of the claim that is secured: \$ Unknown
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
☐ Fixed
☐ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/25/2022
MM / DD / YYYY

/s/ Robert P. Goe

Signature

Print the name of the person who is completing and signing this claim:

Name Robert P. Goe
First name Middle name Last name

Title Attorney

Company Goe Forsythe & Hodges LLP
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 17701 Cowan Avenue, Suite 210
Number Street

Irvine CA 92614
City State ZIP Code



Contact phone (949) 798-2460 Email rgoe@goeforlaw.com

Creditors: Janine Jasso, Jennifer Paulin, Lori Burrett, Lee Gragnano, Lindy Beck, and Ted Phillips
 (Individual Board Members of the Huntington Beach Gables Homeowners Association)
 Claim Itemization under FRBP 3001(c)(2)
 October 25, 2022

Table of Judgments in favor of the Individual Board Members of The Huntington Beach Gables Homeowners Association against Debtor, Jamie Lynn Gallian

OCSC Case Number	Case Name	Date of Abstract	Dollar Amount	Number of Pages
30-2017-00913985	The Huntington Beach Gables HOA v. Bradley, Gallian, et al.; Cross-Complaint Debtor filed against Individual Board Members	12/13/2018	\$46,138; plus 10% per annum from 12/4/18 (date of judgment)	6 pages
Total Amount			\$64,049.66	

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, State Bar number, and telephone number) Recording requested by and return to: James E. Hawley (SBN: 299723) GORDON REES SCULLY & MANSUKHANI 633 W. 5th Street, 52nd Floor Los Angeles, CA 90071 TEL NO.: (213) 576-5000 FAX NO. (Optional): (877) 306-0043 E-MAIL ADDRESS (Optional): <input checked="" type="checkbox"/> ATTORNEY FOR <input type="checkbox"/> JUDGMENT CREDITOR <input type="checkbox"/> ASSIGNEE OF RECORD		FOR RECORDER'S USE ONLY	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 700 W. Civic Center Dr. MAILING ADDRESS: CITY AND ZIP CODE: Santa Ana, 92701 BRANCH NAME: Central Justice Center			
PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Sandra L. Bradley; Jamie L. Gallian et al.		CASE NUMBER: 30-2017-00913985-CU-CO-CJC	
ABSTRACT OF JUDGMENT—CIVIL AND SMALL CLAIMS <input type="checkbox"/> Amended		FOR COURT USE ONLY	
1. The <input checked="" type="checkbox"/> judgment creditor <input type="checkbox"/> assignee of record applies for an abstract of judgment and represents the following: a. Judgment debtor's Name and last known address Jamie L. Gallian 5782 Pinon Drive Huntington Beach, CA 92649 b. Driver's license no. [last 4 digits] and state: <input checked="" type="checkbox"/> Unknown c. Social security no. [last 4 digits]: 3936 <input type="checkbox"/> Unknown d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address): Jamie L. Gallian, 5782 Pinon Drive, Huntington Beach, CA 92649		<div style="border: 1px solid black; padding: 5px;">Pursuant to California Government Code § 68150(f), the Clerk of the Court hereby certifies this document accurately reflects the official court record. The electronic signature and seal on this document have the same validity and legal force and effect as an original clerk's signature and court seal. California Government Code § 68150(g).</div>	
2. <input type="checkbox"/> Information on additional judgment debtors is shown on page 2. 3. Judgment creditor (name and address): Janine Jasso 4469 Chase Dr. Huntington Beach, CA 92649 Date: December 7, 2018 James E. Hawley (TYPE OR PRINT NAME)			
6. Total amount of judgment as entered or last renewed: \$46,138.00 7. All judgment creditors and debtors are listed on this abstract. 8. a. Judgment entered on (date): December 4, 2018 b. Renewal entered on (date): 9. <input type="checkbox"/> This judgment is an installment judgment.		10. <input type="checkbox"/> An <input type="checkbox"/> execution lien <input type="checkbox"/> attachment lien is endorsed on the judgment as follows: a. Amount: \$ b. In favor of (name and address): 11. A stay of enforcement has a. <input checked="" type="checkbox"/> not been ordered by the court. b. <input type="checkbox"/> been ordered by the court effective until (date): 12. a. <input checked="" type="checkbox"/> I certify that this is a true and correct abstract of the judgment entered in this action, b. <input type="checkbox"/> A certified copy of the judgment is attached. Clerk, by  S. Wilson, Deputy	
 David H. Yamasaki, Clerk of the Court This abstract issued on (date): 12/13/2018			

PLAINTIFF: The Huntington Beach Gables Homeowners Association DEFENDANT: Sandra L. Bradley; Jamie L. Gallian et al.	COURT CASE NO.: 30-2017-00913985-CU-CO-CJC
--	---

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (name and address):

Jennifer Paulin
4446 Alderport Dr.
Huntington Beach, CA 92649

14. Judgment creditor (name and address):

Lori Burrett
16107 Warmington Lane
Huntington Beach, CA 92649

15. ☒ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

20. ☐ Continued on Attachment 20.

MC-025

SHORT TITLE: The Huntington Beach Gables HOA v. Bradley; Gallian	CASE NUMBER: 30-2017-00913985-CU-CO-CJC
---	--

ATTACHMENT (Number): 15

(This Attachment may be used with any Judicial Council form.)

Additional Judgment Creditors

Lee Gragnano
16062 Warmington Ave.
Huntington Beach, CA 92649

Lindy Beck
4443 Chase Drive
Huntington Beach, CA 92649

Ted Phillips
4447 Chase Drive
Huntington Beach, CA 92649

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1

(Add pages as required)

3728619

ELECTRONICALLY RECEIVED
Superior Court of California,
County of Orange
11/09/2018 at 10:23:23 AM
Clerk of the Superior Court
By eClerk, Deputy Clerk

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

DEC 04 2018

DAVID H. YAMASAKI, Clerk of the Court

BY: _____, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

THE HUNTINGTON BEACH GABLES
HOMEOWNERS ASSOCIATION, a
California Nonprofit Mutual Benefit
Corporation,

Plaintiff,

v.

SANDRA L. BRADLEY, individually and
as Trustee of the Sandra L. Bradley Trust;
JAMIE L. GALLIAN, an individual; and
DOES I through 25, inclusive,

Defendants.

AND RELATED CROSS-ACTIONS.

) Case No. 30-2017-00913985-CU-CO-
) CJC

) *Honorable James L. Crandall*

) **[PROPOSED] JUDGMENT FOR**
) **ATTORNEYS' FEES**

) FAC Filed: May 16, 2017

) Trial Date: December 10, 2018

-1-

[PROPOSED] JUDGMENT FOR ATTORNEYS' FEES

1 The above-captioned matter came on regularly for hearing on Cross-Defendants Lee
2 Gragnano, Ted Phillips, Lindy Beck, Jennifer Paulin, Janine Jasso, and Lori Burrett's Motion for
3 Attorneys' Fees and Costs on November 1, 2018 and November 8, 2018, in Department C33 of
4 the Superior Court in and for the State of California, County of Orange, the Honorable James L.
5 Crandall presiding.

6 Cross-Defendants Lee Gragnano, Ted Phillips, Lindy Beck, Jennifer Paulin, Janine Jasso,
7 and Lori Burrett appeared by and through its attorneys, Brenda Radmacher of Gordon & Rees,
8 LLP. Cross-Complainant Jamie L. Gallian, in pro per, appeared on behalf of herself. After
9 hearing evidence and arguments, and good cause appearing;

10 **NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED** that Cross-
11 Defendants Lee Gragnano, Ted Phillips, Lindy Beck, Jennifer Paulin, Janine Jasso, and Lori
12 Burrett are awarded their attorneys' fees in the amount of \$46,138.00 against Cross-Complainant
13 Jamie L. Gallian. Post-judgment interest at a rate of ten (10) percent annum from the date hereof,
14 till paid, shall accrue on the amount above.

15 **IT IS SO ORDERED, ADJUDGED AND DECREED.**

16
17 Dated: 12-4-, 2018

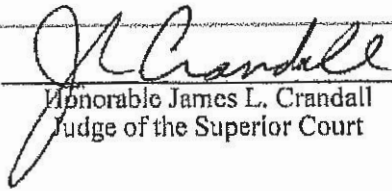

Honorable James L. Crandall
Judge of the Superior Court

EXHIBIT 11

1 UNITED STATES BANKRUPTCY COURT

2 CENTRAL DISTRICT OF CALIFORNIA

3 --oOo--

4 In Re:) Case No. 8:21-bk-11710-SC
5 JAMIE LYNN GALLIAN,)
6 Debtor.) Chapter 7
7) Santa Ana, California
8) Wednesday, April 26, 2023
9) 9:30 a.m.
10 HOUSER BROS. CO.,) Adv. No. 8:21-ap-01097-SC
11 Plaintiff,)
12 vs.)
13 GALLIAN,)
14 Defendant.)

14 CONT'D TRIAL RE: FIRST AMENDED
15 COMPLAINT TO (2) DENY
16 DISCHARGE PURSUANT TO 11
17 U.S.C. SECTIONS 727(A)(2)(A),
18 (A)(4), AND (A)(5) (COMPLAINT
19 FILED 10/22/2021) (FIRST
20 AMENDED COMPLAINT FILED
21 10/22/2021) [CASE TRANSFERRED
22 FROM ES ON 9/1/2022] (SET AT
23 SC HELD 1-6-22) (TRIAL SET AT
24 HEARING HELD 9/27/2022) [TRIAL
25 ONLY AS TO 727 ACTION]
[IN-PERSON HEARING]

21 TRANSCRIPT OF PROCEEDINGS
22 BEFORE THE HONORABLE SCOTT C. CLARKSON
23 UNITED STATES BANKRUPTCY JUDGE

24 Proceedings produced by electronic sound recording;
25 transcript produced by transcription service.

1 APPEARANCES:

2 For the Plaintiff:

D. EDWARD HAYS, ESQ.
BRADFORD N. BARNHARDT, ESQ.
Marshack Hays, LLP
870 Roosevelt
Irvine, California 92620
(949) 333-7777

6 For the Defendant:

JAMIE LYNN GALLIAN, IN PRO PER
16222 Monterey Lane
Unit 376
Huntington Beach, California
92649
(714) 321-3449

10 Court Recorder:

James Le
United States Bankruptcy Court
411 West Fourth Street
Suite 2030
Santa Ana, California 92701

13 Transcriber:

Briggs Reporting Company, Inc.
9711 Cactus Street
Suite B
Lakeside, California 92040
(310) 410-4151

iii

1		<u>I N D E X</u>			
2	<u>WITNESSES</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
3	Jamie L. Gallian	9	--	--	--
4		135			
5	Gregory J. Buysman	240	243	--	--
6	Christopher C. Houser	278	287	--	--
7	Jamie L. Gallian (recalled)	303	384	--	--
8					
9	<u>EXHIBITS</u>		<u>IDENTIFIED</u>		<u>RECEIVED</u>
10	<u>Plaintiff's:</u>				
11	1 Documents			50	51
12	thru				
13	3				
14	4 Ryan release form, certificate of title			36	51
15	5 Ryan notice of sale or transfer			31	51
16	6 Documents			50	51
17	thru				
18	9				
19	10 Security agreement w/promissory note			50	51
20	11 Documents			50	51
21	thru				
22	24				
23	25 Statement to encumber			50	51
24	26 Documents			50	51
25	thru				
	27				
	28 Original voluntary petition			50	51

iv

1	<u>EXHIBITS</u> (cont'd.)	<u>IDENTIFIED</u>	<u>RECEIVED</u>
2	<u>Plaintiff's:</u>		
3	29 Amended schedules and statements thru	50	51
4	30		
5	31 Document	50	51
6	32 Amended schedules and statements thru	50	51
7	34		
8	35 Documents thru	50	51
9	37		
10	38 Amended schedules and statements	50	51
11	39 Document	50	51
12	40 Debtor's opposition to objection to exemption	50	51
13			
14	41 Document	50	51
15	42 Declaration of Buysman	50	51
16	43 Documents thru	50	51
17	46		
18	47 Claim 4-1, filed 10/5/22	52	52
19	48 Claim 1-2, filed 10/25/22	55	58
20	49 Deposition transcript	338	338
21			
22	<u>Defendant's:</u>		
23	(None.)		
24			
25			

SANTA ANA, CALIFORNIA WEDNESDAY, APRIL 26, 2023 9:30 AM

--oOo--

(Call to order of the Court.)

THE CLERK: Good morning, everyone. Please be seated.

MR. HAYS: Good morning, your Honor.

MS. GALLIAN: Good morning, your Honor.

THE COURT: Welcome to the April 26, 2023, 9:30 calendar, and today we have Item Number 1, Houser Brothers Company versus Gillian.

May I have appearances, please.

MR. HAYS: Yes. Good morning, your Honor. For the Plaintiff, Houser Brothers, my name is Ed Hays, accompanied by Bradford Barnhardt, of Marshack Hays LLP.

THE COURT: Good morning.

MS. GALLIAN: Good morning, Judge Clarkson. My name is Jamie Gallian. I'm the defendant in this case.

THE COURT: Good morning to you.

MS. GALLIAN: Thank you.

THE COURT: I have to find a yellow pad. I don't have a yellow pad. I wouldn't mind having just any color paper, but just something to make notes on. Thank you.

Today we're having the bifurcated episode of this trial on the first amended complaint deny discharge pursuant to 727(a)(2)(A), (a)(4), and (a)(5).

1 placed over it, and on November 15th, J-Sandcastle Co was
2 added, and I asked Lisa Ryan to then sign again her name on
3 11/15, but she was whiting it out and putting
4 "J-Sandcastle."

5 THE COURT: Excellent.

6 THE WITNESS: My pleasure.

7 THE COURT: No. What you're doing is you're
8 helping me. You're really giving me a guide on what this
9 document is.

10 THE WITNESS: Thank you.

11 THE COURT: So who put the whiteout on?

12 THE WITNESS: Lisa Ryan.

13 THE COURT: Did you see her do it?

14 THE WITNESS: Yes.

15 THE COURT: Did she do it because you asked her to
16 do it?

17 THE WITNESS: No. It was because of a writ of
18 execution.

19 THE COURT: Well, I didn't ask you that.

20 THE WITNESS: I thought you asked why.

21 THE COURT: I asked you, did you ask her?

22 THE WITNESS: No, I did not.

23 THE COURT: Did you ask her to white it out?

24 THE WITNESS: No, I did not.

25 THE COURT: How did she know -- and who wrote,

1 name?

2 THE WITNESS: You mean told her the name? Yes.

3 THE COURT: Yes.

4 THE WITNESS: Yes, your Honor.

5 THE COURT: Okay.

6 THE WITNESS: Yes.

7 THE COURT: So you told her to white out the name
8 of -- your name, and put in "J-Sandcastle Company LLC." Is
9 that correct?

10 THE WITNESS: I don't believe --

11 THE COURT: Then who else would have?

12 THE WITNESS: Well, and if we're going to -- I
13 have documents.

14 THE COURT: Who else would have?

15 THE WITNESS: (No response.)

16 THE COURT: Were you the manager of J-Sandcastle
17 Company LLC?

18 THE WITNESS: I'm the member, sir.

19 THE COURT: Are you the manager?

20 THE WITNESS: I'm the only member.

21 THE COURT: Okay. Are you the manager?

22 THE WITNESS: I suppose so, sir, so yes, sir.

23 THE COURT: Did you ask her to put "J-Sandcastle
24 Company LLC" as the name of "Purchaser," slash, "New Owner"?

25 THE WITNESS: (No response.)

1 THE COURT: How would she have known to do it if
2 you didn't ask her?

3 THE WITNESS: I'm going to say yes, your Honor.

4 THE COURT: Thank you.

5 Mr. Hays, let's proceed as quickly as we can.
6 We're getting bogged down.

7 MR. HAYS: I agree, your Honor. Thank you.

8 BY MR. HAYS:

9 Q Ms. Gallian, can I have you turn to the previous
10 exhibit, which is Exhibit 4, and that document is a state of
11 California certificate of title, and is this the certificate
12 of title that Ms. Ryan signed releasing her interest in the
13 property?

14 THE COURT: Excuse me. Are you talking about
15 Exhibit 4?

16 MR. HAYS: Yes, your Honor.

17 THE COURT: Page 41?

18 MR. HAYS: Yes, your Honor. That's the front page
19 of the certificate of title, and the document continues to a
20 second page, and on the second page, there's releasing
21 signatures in Section B.

22 BY MR. HAYS:

23 Q And, Ms. Gallian, is that the document that Ms. Ryan
24 signed releasing her interest in the property?

25 A Yes, it is.

1 THE WITNESS: Right.

2 THE COURT: So all we need to do is -- it's not a
3 real objection. What you say is you "Understand, Judge,
4 that this is just a partial."

5 THE WITNESS: Okay.

6 THE COURT: And now I know. See, you've helped me
7 already.

8 THE WITNESS: I believe it was 43.

9 THE COURT: Well, we'll find it.

10 THE WITNESS: Yes.

11 THE COURT: But the point is that, when you raise
12 these objections, you help me --

13 THE WITNESS: Thank you, your Honor.

14 THE COURT: -- and I want that assistance from
15 you.

16 THE WITNESS: Thank you. I appreciate that.

17 THE COURT: Thank you.

18 BY MR. HAYS:

19 Q The collateral that was the subject of the security
20 agreement was the manufactured home in Space 376, correct?

21 A That's correct.

22 Q Okay. And so J-Sandcastle, who was on title, pledged a
23 security interest in the mobile home to secure repayment of
24 this \$225,000 we're talking about. That's what these
25 documents were accomplishing, correct?

1 A Yes.

2 Q Okay. Did J-Sandcastle ever pay \$225,000 to J-Pad?

3 A No, sir.

4 Q Okay. Was the money ever paid to you individually?

5 A No, sir.

6 Q Was there ever any lawsuit filed to enforce payment
7 under this note obligation?

8 A No, sir. It's not due yet.

9 Q At the time that this was being done, were you the 100
10 percent owner of J-Sandcastle?

11 A That's correct.

12 Q And have you always been the 100 percent owner of
13 J-Sandcastle?

14 A That's correct.

15 Q At the time that these documents were being drafted,
16 who were the members of J-Pad?

17 A In November of 2000 (sic), the only members of J-Pad
18 were Mr. Calderon, I believe is his name, and myself.

19 Q I think you just said, "In November of 2000." Do you
20 mean November of 2018?

21 A I'm sorry. 2018, sir, yes.

22 Q Okay. And how much did Mr. Calderon own of J-Pad?

23 A I believe at the time only \$5,000 worth.

24 Q Was that a percentage, or was it just the dollar
25 amount?

1 you for coming.

2 MR. HAYS: Thank you, your Honor.

3 THE COURT: Court is adjourned.

4 (Proceedings concluded.)

5
6 I certify that the foregoing is a correct
7 transcript from the electronic sound recording of the
8 proceedings in the above-entitled matter.

9 /s/ Holly Steinhauer 5-3-23
10 Transcriber Date

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EXHIBIT 12

FILED & ENTERED

MAY 23 2023

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY bolte DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re:

Jamie Lynn Gallian,

Debtor(s).

Case No.: 8:21-bk-11710-SC

CHAPTER 7

Adv No: 8:21-ap-01097-SC

- (1) ORDER DENYING MOTION TO
AMEND AND VACATING HEARING;
(2) MEMORANDUM DECISION AFTER
TRIAL REGARDING §727 CLAIMS;
AND
(3) SETTING STATUS CONFERENCE
ON REMAINING § 523 CLAIMS

Houser Bros. Co., dba Rancho Del Rey
Mobile Home Estates,

Plaintiff(s),

v.

Jamie Lynn Gallian,

Defendant(s).

§727 Trial:

Date: April 26, 2023

Time: 9:30 a.m.

Courtroom: 5C

1 On April 26, 2023, a trial was held in the above captioned adversary proceeding
2 (“April 26 Trial”). D. Edward Hays, Esq. and Bradford Barnhardt, Esq. appeared on
3 behalf of Plaintiff Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates
4 (“Plaintiff”), as did Christopher Houser, who appeared and testified as Plaintiff’s
5 representative. Greg Buysman was also called as a witness by Plaintiff. Defendant
6 Jamie Lynn Gallian (“Defendant” or “Debtor”) appeared pro se and testified. All
7 witnesses were cross-examined by the opposing party.

8 During trial, Plaintiff presented its case, seeking the denial of Defendant’s
9 discharge under 11 U.S.C. §§727(a)(2)(A), (a)(4), and (a)(5).¹ Plaintiff did not include a
10 cause of action for §727(a)(2)(B)² in its complaint; however, after the parties had rested,
11 and after the close of evidence, Plaintiff orally moved to amend the complaint to
12 conform to the evidence presented at trial (i.e., Defendant’s admissions of her attempts
13 to perfect post-petition liens). While the Court permitted the parties to address
14 §727(a)(2)(B) in their closing statements and post-trial briefs, it did so concurrently with
15 the expressed requirement that Plaintiff file a written motion to amend, to be heard on
16 regular notice, which would need to be granted before the Court would consider the
17 inclusion of the new cause of action. Plaintiff filed its written motion to amend the
18 complaint on May 10, 2023 [Dk. 76] (“Motion to Amend”), setting the matter for hearing
19 on June 1, 2023. On May 18, 2023, Defendant filed her opposition [Dk. 79].³

20 Additionally, the Court granted Defendant the opportunity to file a supplemental
21

22 ¹ The Court bifurcated Plaintiff’s claims for relief under 11 U.S.C. § 523 and ordered that the trial would
23 proceed only as it relates to Plaintiff’s claims for relief under § 727. See Dk. 58.

24 ² § 727(a)(2)(B) states: “The court shall grant the debtor a discharge, unless— (2) the debtor, with intent
25 to hinder, delay, or defraud a creditor or an officer of the estate charged with custody of property under
26 this title, has transferred, removed, destroyed, mutilated, or concealed, or has permitted to be transferred,
removed, destroyed, mutilated, or concealed—(B) property of the estate, after the date of the filing of the
petition.”

27 ³ The Court notes that Defendant improperly raised the issue of standing by attaching what appears to be
28 recycled from a prior pleading related to a motion for relief from stay filed earlier in the case. See
Opposition to Motion to Amend filed May 17, 2023, Dk. 79, Pg. 9. The Court will address the issue of
Plaintiff’s standing herein, briefly, but not in connection with the motion to amend which is denied herein.

1 declaration accounting for her expenditures in greater detail, which Defendant provided
2 twice: on May 1, 2023 [Dk. 71] and May 8, 2023 [Dk. 73].⁴ Moreover, the Court
3 requested post-trial briefs from both parties, which briefs were timely filed on May 10,
4 2023 [Dks. 74 and 77].

5 After considering the arguments of the parties, the pleadings filed prior to and
6 after trial, all evidence admitted during trial and based upon the discussion on the
7 record at trial, and for the reasons more fully explained below, the Court finds good
8 cause to enter the following order DENYING the Motion to Amend, VACATING the
9 hearing on the Motion to Amend, and rendering judgment in favor of Plaintiff and
10 against Defendant on each of its original § 727 causes of action (i.e., 11 U.S.C. §§
11 727(a)(2)(A), (a)(4) and (a)(5)).

12 **I. Plaintiff's Standing**

13 As a preliminary matter, the Court finds that, contrary to the repeated assertions
14 of Defendant, Plaintiff has proper standing to pursue this action.

15 Under Section 727(c)(1), a creditor has standing to object to the granting of a
16 discharge under Section 727(a). See 11 U.S.C. § 727(c)(1) ("The trustee, a creditor, or
17 the United States trustee may object to the granting of a discharge . . ."). A creditor is
18 defined under the Bankruptcy Code as an "entity that has a claim against the debtor that
19 arose at the time of or before the order for relief concerning the debtor." 11 U.S.C. §
20 101(10). A claim is a "right to a payment, whether or not such right is reduced to
21 judgment, liquidated, fixed, contingent, matured, unmatured, *disputed*, undisputed,
22 legal, equitable, secured or unsecured." 11 U.S.C. § 101(5) (emphasis added).

23 Plaintiff is a creditor of Debtor's estate, having filed a proof of claim (Claim #3) on
24 October 23, 2022. That the facts underlying Plaintiff's claim against Debtor are disputed
25 by Debtor is insufficient to deprive Plaintiff of standing to bring this action. See *Spaich v.*
26 *Smith (In re Spaich)*, 2005 Bankr. LEXIS 3431, at *3 (B.A.P. 9th Cir. 2005) ("[T]here is
27

28 ⁴ The latter filing contained improperly authenticated documentary evidence, presumably intended to corroborate certain of the expenditures. The Court has reviewed and considered both documents, despite the fact that both declarations were filed outside of the timeframe ordered by the Court.

1 nothing in the Code or the Rules which suggest that only creditors with proven claims
2 may file such an action, and case law suggests the contrary.”) Moreover, “lack of injury
3 to creditors is irrelevant for purposes of denying a discharge in bankruptcy.” *Retz v.*
4 *Samson (In re Retz)*, 606 F.3d 1189, 1200 (9th Cir. 2010). Accordingly, Defendant’s
5 objections with regard to Plaintiff’s standing to bring this action against her are
6 OVERRULED.

7 **II. Plaintiff’s Motion to Amend**

8 Rule 15(b)(2) of the Federal Rules of Civil Procedure (FRCP) is made applicable
9 to this adversary proceeding by Rule 7015 of the Federal Rules of Bankruptcy
10 Procedure (FRBP), and permits a party to “move – at any time, even after judgment – to
11 amend the pleadings to conform them to the evidence and to raise an unpleaded issue.”
12 Fed. R. Civ. P. 15(b)(2).

13 “To amend a pleading under rule 15(b)(2) a party must show that an issue was
14 tried by the parties’ express or implied consent... **and** that amendment would not cause
15 substantial prejudice to the opposing party.” *Phila. Indem. Ins. Co. v. Danco Builders*,
16 2017 U.S. Dist. LEXIS 136338, at *9 (N.D. Cal. 2017) (internal citations and quotations
17 omitted) (emphasis added).

18 During Plaintiff’s examination of Defendant at the April 26 Trial, Defendant
19 admitted to gifting post-petition liens against her residence to her son, granddaughter,
20 ex-husband, and roommate with the stated purpose of “getting her affairs in order.”
21 Plaintiff seeks to amend its complaint to include a § 727(a)(2)(B) cause of action
22 because Defendant admitted certain facts at trial regarding post-petition liens. Plaintiff
23 appears to argue that Defendant impliedly consented to try the issue because
24 Defendant did not object to Plaintiff’s counsel’s questions regarding post-petition liens
25 during her examination, and Defendant addressed Plaintiff’s allegations with regard to
26 the post-petition liens during the presentation of her defense. Plaintiff further argues that
27 Defendant articulated no prejudice which would result from Plaintiff’s proposed
28 amendment, and that there would, in fact, be no prejudice to Defendant because *inter*

1 *alia*, the standard for denial of discharge is the same as § 727(a)(2)(A) (which cause of
2 action was originally plead) except with respect to the timing of the disposition of estate
3 property (i.e., before or after the petition date). In short, Plaintiff asserts that because §
4 727(a)(2)(B) is not “a wildly new legal theory”, there is no prejudice to Defendant in
5 addressing it herein. The Court disagrees.

6 The purpose of Rule 15(b) is to freely allow the pleadings to be amended “to
7 reflect the actual issues upon which a case was tried.” *Prieto v. Paul Revere Life Ins.*
8 *Co.*, 354 F.3d 1005, 1012 (9th Cir. 2004). However, “[t]he rule does not permit
9 amendments to include issues which may be inferentially suggested by incidental
10 evidence in the record.” *Consol. Data Terminals v. Applied Dig. Data Sys.*, 708 F.2d
11 385, 396 (9th Cir. 1983) (internal quotations omitted). [A] trial court may not base its
12 decision upon an issue that was tried inadvertently.” *Id.* at 397.

13 “An adverse party cannot be expected to object to the introduction of evidence
14 that is only tangentially related to the issues actually pleaded prior to trial **unless** the
15 party has notice that the evidence is being introduced as proof on some other
16 unpleaded issue.” *Id.* (emphasis added). Therefore, “to establish implied consent, the
17 plaintiff must demonstrate that the defendant understood evidence had been introduced
18 to prove the new issue and that the new issue had been directly addressed, not merely
19 inferentially raised by incidental evidence.” *Jaurigui v. Jaurugui (In re Swing House*
20 *Rehearsal & Recording, Inc.)*, 2022 Bankr. LEXIS 702, at *4-5 (Bankr. C.D. Cal. 2022).

21 That Defendant did not object to questioning regarding the post-petition liens and
22 that after her admissions regarding the post-petition liens, Defendant replied in her
23 defense to Plaintiff’s assertions raised in closing argument, is in this Court’s view,
24 insufficient to demonstrate that Defendant impliedly consented to try the §727(a)(2)(B)
25 cause of action. It is Plaintiff’s burden to demonstrate that Defendant understood at trial
26 that the evidence was being introduced to prove §727(a)(2)(B) specifically, and that §
27 727(a)(2)(B) would be directly addressed. That was not the case here.

28 Plaintiff offers no explanation for why it did not seek to add this cause of action

1 until trial, except stating that “Debtor had not disclosed the post-petition transfers and
2 Houser Bros. only discovered them during the [adversary] case.” Motion to Amend, Dk.
3 76, Pg. 3:8-12.⁵ However, the Court notes that it was well-understood, before trial, that
4 the issue of Debtor’s post-petition transfers would be raised. Plaintiff’s trial brief
5 referenced such transfers as evidence supporting Plaintiff’s §727(a)(2)(A) cause of
6 action. Plaintiff’s Trial Brief filed February 9, 2023, Dk. 55, Pgs. 20:22-21:21 (emphasis
7 added). No mention of §727(a)(2)(B) was raised in that brief, despite Plaintiff’s clear
8 knowledge of the transfers. Plaintiff and Defendant agreed to the admission of various
9 UCC Amendments (including Exhibit 14 evidencing the existence of post-petition liens
10 to Debtor’s sons), in the pre-trial stipulation filed September 13, 2022 [Dk. 37, Pg. 18],
11 and Plaintiff’s questioning at the April 26 Trial indicates that the pre-petition liens were
12 discussed in Defendant’s pre-trial deposition, which Defendant testified occurred in
13 June of 2022. Trial transcript, Dk. 72, Pg. 88:2-25 and 74:22-24. While the
14 §§727(a)(2)(A) and (a)(2)(B) causes of action are similar, they are also distinct and
15 separate statutory grounds upon which to object to discharge. To allow Plaintiff to raise
16 the issue in connection with §727(a)(2)(A), and then merely summarize the facts
17 incidentally obtained therewith at the close of proceedings to pile on an additional, but
18 different, cause of action that had not been mentioned in the nearly 2 years leading up
19 to trial against Defendant is prejudicial, and not, in this Court’s view, fitting with the
20 purpose of Rule 15(b).

21 For the foregoing reasons, Plaintiff has not met its burden. Accordingly, the
22 Motion to Amend is DENIED and the hearing VACATED.

23 **III. April 26 Trial**

24 Trial on Plaintiff’s operative complaint seeking the denial of Defendant’s
25 discharge under 11 U.S.C. §§ 727(a)(2)(A), (a)(4) and (a)(5) was held on April 26, 2023.

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28

⁵ It is unclear precisely when Plaintiff became aware of the post-petition liens; however, the Court
observes that the admitted post-petition liens were placed in September 2021 – well before the discovery
deadline of March 31, 2022, and nearly two years before the April 26 Trial. See Order entered February
15, 2022, Dk. 16.

1 “Those objecting to discharge bear the burden of proving by a preponderance of the
2 evidence that [the debtor's] discharge should be denied.” *Retz v. Samson (In re Retz)*,
3 606 F.3d 1189, 1196 (9th Cir. 2010) (citing *Khalil v. Developers Sur. & Indem. Co. (In re*
4 *Khalil)*, 379 B.R. 163, 172 (B.A.P. 9th Cir. 2007), *aff'd*, 578 F.3d 1167, 1168 (9th Cir.
5 2009). “In keeping with the ‘fresh start’ purposes behind the Bankruptcy Code, courts
6 should construe § 727 liberally in favor of debtors and strictly against parties objecting
7 to discharge.” *Id.* (citing *Bernard v. Sheaffer (In re Bernard)*, 96 F.3d 1279, 1281 (9th
8 Cir. 1996)).

9 During the April 26 Trial, which lasted one day,⁶ evidence was introduced and

10
11 ⁶ The Court recognizes that the April 26 Trial was a long affair, beginning at 9:30 a.m., and concluding
12 around 8:00 p.m. (with breaks). Given the seriousness of the allegations, and the lack of credibility of
13 Defendant’s testimony, the Court determined that conducting the trial in a single day was of paramount
14 importance. A court’s litigation decisions are reviewed for abuse of discretion. *See Sekera v. Allstate Ins.*
15 *Co.*, 763 Fed. Appx. 629, 630 (9th Cir. 2019) (“We review a district court’s decision concerning the
16 management of litigation for abuse of discretion. *Preminger v. Peake*, 552 F.3d 757, 769 n.11 (9th Cir.
17 2008) (citing *FTC v. Enforma Nat. Prods., Inc.*, 362 F.3d 1204, 1212 (9th Cir. 2004)”). *See also Coe v.*
18 *Fanday (In re Fanday)*, 538 Fed. Appx. 748, 749 (9th Cir. 2013) (“... bankruptcy court’s management of
19 Coe’s questioning was far from an abuse of discretion. [internal citations omitted]). Such discretion is
20 broad, and as noted by the Third Circuit, such discretion may include imposition of time limits at trial:

21
22 Notably, we have recognized that a district court may impose limits on the parties’ presentation
23 time at trial, so long as the court both “mak[es] an informed analysis based on a review of the
24 parties’ proposed witness lists and proffered testimony” and “allocates trial time evenhandedly.”
25 *Duquesne Light Co.*, 66 F.3d at 610. Other circuits have likewise concluded that a district court
26 may, in its discretion, set reasonable trial time limits. *See, e.g., United States v. DeCologero*, 364
27 F.3d 12, 25 (1st Cir. 2004) (“[L]imits on witnesses and the time allowed to each side are
28 permissible measures.”) (citations omitted); *Deus v. Allstate Ins. Co.*, 15 F.3d 506, 520 (5th Cir.
1994) (“In the management of its docket, the court has an inherent right to place reasonable
limitations on the time allotted to any given trial.”) (citing *United States v. Reaves*, 636 F. Supp.
1575, 1577 (E.D. Ky. 1986)); *Sutkiewicz v. Monroe Cnty. Sheriff*, 110 F.3d 352, 361 (6th Cir.
1997) (“[A] district court has broad discretion to place limits on the presentation of evidence to
prevent delay, waste of time, and needless presentation of cumulative evidence.”) (citing
Duquesne Light Co., 66 F.3d at 609); *MCI Commc’ns Corp.*, 708 F.2d at 1172-73 (holding that
reasonable trial time limits do not violate the right to a fair trial); *Johnson v. Ashby*, 808 F.2d 676,
678 (8th Cir. 1987) (“Trial courts have discretion to place reasonable limits on the presentation of
evidence”) (citations omitted); *Gen. Signal Corp. v. MCI Telecomms. Corp.*, 66 F.3d 1500,
1508 (9th Cir. 1995) (“Generally, a district court may impose reasonable time limits on a trial.”)
(citations omitted).

26 *In re Baldwin*, 700 F.3d 122, 129 (3rd Cir. 2012).

27 After the presentation of testimony at the April 26 Trial was complete, and in recognition of the parties’
28 efforts throughout the day and in the interest of alleviating any perceptions of unfairness, the Court
provided both parties the opportunity to file post-trial briefings containing argument summarizing the
evidence proffered throughout the day. Moreover, Defendant was provided the opportunity to submit
additional evidence, in the form of an accounting. As more fully noted herein, both parties took advantage

1 both sides were presented the opportunity to provide written closing statements to the
2 Court. Moreover, witness testimony was taken, during which the Court engaged in a
3 credibility analysis. A credible witness is a witness who comes across as competent and
4 worthy of belief. This Court determines witness credibility on many factors. The
5 substance of the testimony is tantamount, as well as the amount of detail and the
6 accuracy of recall of past events, which affect the Court's credibility determination.
7 Witness contradiction plays a part in the credibility determination. How the testimony is
8 delivered also has an impact. Factors which include body language, eye contact, and
9 whether the responses are direct or appear to be evasive, unresponsive, or incomplete
10 are considered by this Court. In addition, when deciding cases, the Court is permitted to
11 take into consideration its knowledge and impressions founded upon experiences in
12 everyday walks of life.

13 Under this backdrop, the Court finds the testimony of Plaintiff's witnesses, Mr.
14 Houser and Mr. Buysman, forthright and credible. On the other hand, the Court finds the
15 testimony of Defendant not credible. In reaching these credibility determinations, the
16 Court considered each witness's demeanor as they testified, including the way they held
17 themselves, whether they made or did not make inconsistent statements, and their
18 directness or evasiveness.

19 Now, having reviewed all pleadings, considering the arguments of counsels, and
20 having weighed the evidence admitted during the trial, the Court concludes that Plaintiff
21 has met its burden as to each of the § 727 causes of action asserted in Plaintiff's
22 operative complaint, as set forth in greater detail below.

23 **a. 11 U.S.C. § 727(a)(2)(A)**

24 Under § 727(a)(2)(A), a discharge shall be granted unless "the debtor, with intent
25 to hinder, delay, or defraud a creditor or an officer of the estate charged with custody of
26 property under this title, has transferred, removed, destroyed, mutilated, or concealed,
27 or has permitted to be transferred, removed, destroyed, mutilated, or concealed...

28 _____
of the aforementioned opportunities.

property of the debtor, within one year before the date of the filing of the petition.” 11
U.S.C. § 727(a)(2)(A).

“The term transfer ‘means every mode, direct or indirect, absolute or conditional,
voluntary or involuntary, of disposing of or parting with property or with an interest in
property, including retention of title as a security interest and foreclosure of the debtor's
equity of redemption.” *Eckard Brandes, Inc. v. Riley (In re Riley)*, Nos. 01-4452, 02-
00013 (citing 11 U.S.C. § 101(54)). “Under this definition, any transfer of an interest in
property is a transfer, including a transfer of possession, custody, or control even if
there is no transfer of title, because possession, custody, and control are interests in
property.” “The transfer to the corporation of assets in which the debtors had
partnership interests constitutes a ‘transfer’ of ‘property of the debtor’ for purposes of
section 727(a).” *Eckard Brandes, Inc. v. Riley (In re Riley)*, Nos. 01-4452, 02-00013,
2004 Bankr. LEXIS 1656, at *8-9 (Bankr. D. Haw. 2004) (internal quotations and
citations omitted).

To satisfy intent, “the court must find that the Debtors harbored actual intent to
hinder, delay, or defraud a creditor...The existence of this intent is a finding of fact
reviewable for clear error. We may infer the intent from the circumstances surrounding
the transaction.” *In re Woodfield*, 978 F.2d 516, 518 (9th Cir. 1992). “A debtor's intent
need not be fraudulent to meet the requirements of § 727(a)(2). Because the language
of the statute is in the disjunctive it is sufficient if the debtor's intent is to hinder or delay
a creditor.” *Retz v. Samson (In re Retz)*, 606 F.3d 1189, 1200 (9th Cir. 2010) (internal
quotations and citations omitted).

“In examining the circumstances of a transfer under § 727(a)(2), certain ‘badges
of fraud’ may support a finding of fraudulent intent. These factors, not all of which need
be present, include (1) a close relationship between the transferor and the transferee;
(2) that the transfer was in anticipation of a pending suit; (3) that the transferor Debtor
was insolvent or in poor financial condition at the time; (4) that all or substantially all of
the Debtor's property was transferred; (5) that the transfer so completely depleted the

1 Debtor's assets that the creditor has been hindered or delayed in recovering any part of
2 the judgment; and (6) that the Debtor received inadequate consideration for the
3 transfer.” *Retz v. Samson (In re Retz)*, 606 F.3d 1189, 1200 (9th Cir. 2010) (internal
4 quotations and citations omitted).

5 Moreover, “[u]nder the ‘continuing concealment’ doctrine, a transfer made and
6 recorded more than one year prior to filing may serve as evidence of the requisite act of
7 concealment where the debtor retains a secret benefit of ownership in the transferred
8 property within the year prior to filing.” *In re Lawson*, 122 F.3d 1237, 1240 (9th Cir.
9 1997).

10 The evidence presented at trial demonstrates that in late 2018 while Defendant
11 was engaged in state court lawsuits that could possibly result in money judgments
12 against her [Trial Transcript, Dk. 72, Pg. 43-51], she sold a residence held in her own
13 name and used the proceeds from that sale to purchase a mobile home.⁷ Trial
14 Transcript, Dk. 72, Pg. 24- 27. Despite using proceeds that belonged to her individually,
15 she directed the seller to replace her name with the name of her solely owned and
16 managed company, J-Sandcastle Company, LLC. (“J-Sandcastle”), on the notice of sale
17 documentation.⁸ Pre-trial stipulation, Dk. Paragraph 6; Trial Transcript, Dk. 72, Pg. 37-
18 40. She further testified that she directed the replacement of her name with J-
19 Sandcastle on November 15, 2018, days after a state court granted a motion for
20 attorney’s fees against her. Trial Transcript, Dk. 72, Pg. 36-37 and 49-51. On the date of
21

22 ⁷ As an example of Defendant’s lack of credibility, she was unable to cogently describe the payments that
23 were made to purchase the mobile home from the seller; the payments did not add up to the
24 \$185,000 purchase price, which price Defendant further admitted was different from the \$225,000 price
25 stated on the notice of sale. Trial Transcript, Dk. 72, Pg. 26-33. Defendant offered no explanation for the
26 discrepancy and her failure to accurately describe the payments.

27 ⁸ Defendant’s testimony regarding this issue was likewise an example of her lack of credibility. After
28 initially testifying that she did not direct the seller to place title in the name of J-Sandcastle Company,
LLC., [Trial Transcript, Dk. 72, Pg. 37], she later admitted that her name was previously listed on the
document and that she did, in fact, later ask the seller to replace her own name with J-Sandcastle
Company, LLC. as the buyer. Trial Transcript, Dk. 72, Pg. 39-40. Moreover, later in the trial, when asked
by the Court to confirm that she purchased the property with her own money and put it in the name of J-
Sandcastle, she initially answered in the negative, conceding only after continued questioning and
reminders of that to which she had previously testified. Trial Transcript, Dk. 72, Pg. 323-325.

Debtor's petition, July 9, 2021, the property was still being held in the name of J-Sandcastle, and not in Defendant's name.

The Court observes that this act alone (i.e., Defendant directing title to the property she purchased to be placed in the name of her wholly owned entity) is rife with multiple badges of fraud, including Defendant's close relationship to the entity she directed title to, the timing of providing such direction in light of pending litigation, and the lack of consideration involved. It is clear to the Court that Defendant placed her asset into the name of J-Sandcastle for the purpose of protecting her asset,⁹ effectively hindering, delaying, and defrauding her potential creditors from reaching the property. Moreover, Defendant's strategy of concealing this asset continued through the petition date, satisfying the elements of § 727(a)(2)(A).

Additionally, facts were presented to the Court demonstrating that Defendant further concealed her equity in the property through the granting of liens to her business entities and family members, which liens existed during the relevant time period. For example, in late 2018, Defendant also executed a promissory note and security agreement on the mobile home by and between two entities that she managed, J-Sandcastle and J-Pad, LLC. ("J-Pad"). J-Sandcastle was the borrower and J-Pad the lender. The agreement required J-Sandcastle to pay J-Pad \$225,000 for a purported loan; however, J-Pad did not loan any money to J-Sandcastle. Trial Transcript, Dk. 72, Pg. 66. Defendant herself made the loan to J-Sandcastle, though the loan was initially in the amount of \$175,000 Defendant did not fund the balance of the \$225,000 loan until approximately 6 months later. Trial Transcript, Dk. 72, Pg. 65-66.¹⁰ None of the

⁹ Defendant testified that she "didn't believe that putting a home in an LLC that I owned solely was doing anything wrong" and that "[a]t the time when the home was transferred, or registered, to so speak, in the LLC's name, [her] potential exposure was...\$46,138 and \$3,070." Trial Transcript, Dk. 72, Pg. 328:5-13. In short, Defendant testified that she thought that it was her money, and that she could do what she wanted with it. *Id.* The Court finds this testimony to be unpersuasive in light of the defunctive and incredible manner that Defendant answered questions related to the transfers, as well as the pending lawsuits and her general financial situation at the time of the transfers.

¹⁰ The Court notes that Defendant's inability to account for the specific amounts paid and timing of said payments during her testimony further underscores her lack of credibility. Trial Transcript, Dk. 72, Pg. 65-66.

1 foregoing information regarding the timing of funding, or source of funding, was
2 reflected in the executed documents. In her petition, Defendant scheduled J-Pad as a
3 secured creditor, continuing the ongoing concealment of her true interest in the loan.
4 Additionally, within the year prior to the petition, liens in favor of Defendant's two adult
5 sons, Steven and Brian Gallian, were placed on the property, despite the fact that
6 neither had paid any consideration. Trial Transcript, Dk. 72, Pg. 72-73.

7 While Defendant attempted to provide explanations for the foregoing to the Court
8 *in camera* and on the record, the Court finds such explanations to be insufficient to
9 refute the overwhelming evidence demonstrating that Defendant had the requisite intent
10 to hinder, delay, or defraud her creditor, when she transferred and concealed her
11 interests in the property described above.

12 Accordingly, Plaintiff is entitled to judgment against Defendant on its §
13 727(a)(2)(A) cause of action.

14 **b. 11 U.S.C. § 727(a)(4)**

15 Under § 727(a)(4), a debtor's discharge shall be granted unless "the debtor
16 knowingly and fraudulently, in or in connection with the case – (A) made a false oath or
17 account." To prevail on a § 727(a)(4)(A) claim, a plaintiff must show, by a
18 preponderance of the evidence, that: "(1) the debtor made a false oath in connection
19 with the case; (2) the oath related to a material fact; (3) the oath was made knowingly;
20 and (4) the oath was made fraudulently." *Retz v. Samson (In re Retz)*, 606 F.3d 1189,
21 1197 (9th Cir. 2010).

22 A false oath can be made in written submissions to the Court or under oath at a §
23 341 meeting, deposition, or trial:

24 "A debtor's petition, schedules, statement of financial affairs, statements made at
25 a 341 meeting, testimony given at a Federal Rule of Bankruptcy Procedure 2004
26 examination, and answers to interrogatories all constitute statements under oath
27 for purposes of § 727(a)(4)[(A)]. The same holds true for deposition testimony
28 and testimony at other hearings during the course of the bankruptcy case. The
false oath also need not be an affirmative misstatement; knowing and fraudulent
omissions will also suffice."

1 *In re Jayme*, 2018 Bankr. LEXIS 1987, 2018 WL 3218104, at *9 (Bankr. D.N.M.)
2 (internal citations omitted).

3 Moreover, the standard for what constitutes a “material” fact is very broad. As
4 stated by the Ninth Circuit, “[a] fact is material if it bears a relationship to the debtor's
5 business transactions or estate, or concerns the discovery of assets, business dealings,
6 or the existence and disposition of the debtor's property. An omission or misstatement
7 that detrimentally affects administration of the estate is material.” *Retz v. Samson (In re*
8 *Retz)*, 606 F.3d 1189, 1198 (9th Cir. 2010) (internal quotations and citations omitted);
9 *See also Joudeh v. Truppa (In re Truppa)*, 2017 Bankr. LEXIS 1157, at *1 (B.A.P. 9th
10 Cir. 2017).

11 In the context of § 727(a)(4), a distinction is made between reckless disregard for
12 the truth, which is sufficient to form intent under the statute, and mere mistake or
13 inadvertence, which is not. *Retz v. Samson (In re Retz)*, 606 F.3d 1189, 1199 (9th Cir.
14 2010) (“Reckless indifference or disregard for the truth may be circumstantial evidence
15 of intent, but is not sufficient, alone, to constitute fraudulent intent.”). Something more
16 must be presented in order to meet the standard.

17 “Neither sloppiness nor an absence of effort by the debtor supports, by itself, an
18 inference of fraud. Courts which hold otherwise are simply devising a court-made
19 prophylactic rule that the debtor must make substantial effort to provide accurate
20 and complete schedules. Had the Congress intended to make such a rule, it
21 could have done so easily, as it did with § 727(a)(3) (failure to keep adequate
22 books and records), and (a)(5) (failure to adequately explain the loss of assets),
23 neither of which have an express element of fraudulent intent. [Citation omitted.]
24 But the Congress did not do so, and it is not for the courts to create new bars to
25 discharge under § 727(a), or to so distort a requisite element as to make it no
26 element at all. The essential point is that there must be something about the
27 adduced facts and circumstances which suggest that the debtor intended to
28 defraud creditors or the estate. **For instance, multiple omissions of material
assets or information may well support an inference of fraud if the nature
of the assets or transactions suggests that the debtor was aware of them at
the time of preparing the schedules and that there was something about
the assets or transactions which, because of their size or nature, a debtor
might want to conceal.”**

Khalil v. Developers Sur. & Indem. Co. (In re Khalil), 379 B.R. 163, 174-75 (B.A.P. 9th

1 Cir. 2007) (citing *Coombs*, 193 B.R. at 565-66) (emphasis added).

2 In keeping with the foregoing, a pattern of half-truths, inconsistencies, and
3 omissions in filed schedules, even if the schedules are ultimately amended to reflect the
4 true assets of the debtor, can be sufficient evidence of fraudulent intent under the
5 statute. See *Joudeh v. Truppa (In re Truppa)*, No. CC-16-1281-KuFL, 2017 Bankr.
6 LEXIS 1157, at *1 (B.A.P. 9th Cir. 2017) (“the court may infer fraudulent intent based on
7 a ‘pattern of falsity.’”); *Trainor v. Evans (In re Evans)*, No. CC-16-1356-KuFTa, 2017
8 Bankr. LEXIS 2232, at *1 (B.A.P. 9th Cir. 2017) (noting that “a pattern of falsity, a
9 reckless indifference to the truth and a failure to amend bankruptcy commencement
10 documents to correct known errors and omissions all can be probative of intent to
11 deceive”); *Cummings v. UST- United States Trustee (In re Cummings)*, 595 Fed. Appx.
12 707, 709-710 (9th Cir. 2015) (“Debtors' eventual disclosure of their interest ... does not
13 negate their initial fraud... To the contrary, the sequence of debtors' filings substantiates
14 the presence of fraud: they elected, twice, to amend their [schedules], and disclosed
15 [the omitted fact] only after the issuance of an order granting the Trustee additional time
16 to investigate.”); *ML Manager, LLC v. Pinsonneault (In re Pinsonneault)*, 2017 Bankr.
17 LEXIS 253, *38 (Bankr. S.D. Cal 2017) (“A false oath is complete when made. A
18 debtor's eventual amendment of their schedules to disclose assets that they knowingly
19 omitted does not negate their initial intent to defraud....The very nature and magnitude
20 of the assets belies the too facile defense that they were simply overlooked or
21 forgotten.”). See also *Jin Min Lee v. Joo Yoon Yeom (In re Joo Yoon Yeom)*, 2017 U.S.
22 Dist. LEXIS 177347, *10-11 (No. Mariana Isl. DC 2017) (“This repeated failure not only
23 demonstrates a conscious decision to omit the information from the bankruptcy filing
24 and therefore establishes the false oath was made knowingly, but it also demonstrates
25 an intent to deceive. Defendant's interest in the business was significant—first as half-
26 owner and later as full owner—and her recurring failure to disclose it, especially given
27 that she agreed to become the full owner of the Poseidon Bar after she filed for
28 bankruptcy, demonstrates that she intended to deceive her creditors.”).

1 Since July 9, 2021, Debtor has filed 10 sets of schedules in this case. In the first
2 five of the amended schedules, which were filed over a span of approximately 2
3 months, Debtor disclosed her interest in J-Pad as "33.33%" [First Amended Schedule
4 filed September 7, 2021, Dk. 15], then "1/7 interest" [Second Amended Schedule filed
5 September 22, 2021, Dk. 16-17], then "70%" [Third Amended Schedule filed October
6 14, 2021, Dk. 22], then "33-1/3%" [Fourth Amended Schedule filed November 16, 2021,
7 Dk. 37], then "100%" [Fifth Amended Schedule filed November 22, 2021, Dk. 38].

8 Despite the foregoing, Defendant testified at trial that as of October 30, 2018, she
9 owned 100% of J-Pad.¹¹ Trial Transcript, Dk. 72, Pg. 154. Her explanation for the
10 varying amounts of interest scheduled over the short period of time was that she owed
11 people money and made a mistake. Trial Transcript, Dk. 72, Pg. 153. The Court is
12 unconvinced. Defendant owns and/or manages multiple companies, and has presented
13 herself though the pendency of her case as a person that is not unsophisticated. It is
14

15 ¹¹ The Court notes that Defendant was at first non-responsive to questioning about her ownership of J-
16 Pad. It was not until the Court reminded Defendant that her credibility was on trial, and that she had
earlier provided testimony of her ownership, that she answered the question regarding her ownership of
J-Pad. Trial Transcript, Dk. 72, Pg. 153-154.

17 THE COURT: ... Why were you making all of these random -- putting down all these random
18 numbers?

19 THE WITNESS: Because I owed people money.

20 THE COURT: Why were you putting down all of those random numbers? We know you owed
21 people money. Why were you saying they owned part of that membership?

22 THE WITNESS: I guess I made a mistake, and at the time --

23 THE COURT: So you just don't know? I'm really looking at your credibility. You've signed several
24 documents, including your first petition, under oath, that it was true and correct, not to the best of
25 your ability, but that it was true and correct, and yet you can't tell me today how much of that
26 percentage you owe, although you've already testified several times today that you own 100
27 percent?

28 THE WITNESS: That's correct.

THE COURT: Okay. When do you think you started owning 100 percent?

THE WITNESS: And these aren't in the documents, I don't believe. I didn't see it.

THE COURT: I don't care if they are. When did you start believing you owned 100 percent of that
LLC?

THE WITNESS: When I was the one that donated most of the money.

THE COURT: When did you do that?

THE WITNESS: It wasn't recorded, but the day before I --

THE COURT: When did you do that?

THE WITNESS: The 30th of October.

THE COURT: What year?

THE WITNESS: 2018.

1 wholly unbelievable to the Court that Defendant, with her ability and knowledge,
2 somehow did not understand her ownership interest in J-Pad or her obligation to report
3 accurate ownership interests in her schedules. As noted previously, J-Pad was the
4 holder of a \$22,000 promissory note. Defendant herself executed the promissory note
5 on J-Pad's behalf, knowing full well of the asset. It is this Court's view that \$225,000 is a
6 significant amount of money, and Defendant's failure to properly schedule her interest in
7 J-Pad, the note and lienholder of a significant asset, is a material, false oath made
8 knowingly and fraudulently. So too was Defendant's failure to schedule a value for J-
9 Pad, who held a significant asset in the form of the aforementioned note and lien on the
10 mobile home.

11 The foregoing, coupled with the evidence presented by Plaintiff of Defendant's
12 other glaring omissions and false oaths,¹² are sufficient to demonstrate that Plaintiff is
13 entitled to judgment against Defendant on its § 727(a)(4) cause of action.

14 **c. 11 U.S.C. § 727(a)(5)**

15 Under § 727(a)(5), a debtor's discharge may be denied if the debtor has failed to
16 explain satisfactorily any loss of assets or deficiency of assets to meet the debtor's
17 liabilities. 11 U.S.C. § 727(a)(5).

18 The plaintiff bears the burden to demonstrate that: "(1) debtor at one time, not too
19 remote from the bankruptcy petition date, owned identifiable assets; (2) on the date the
20 bankruptcy petition was filed or order of relief granted, the debtor no longer owned the
21 assets; and (3) the bankruptcy pleadings or statement of affairs do not reflect an
22 adequate explanation for the disposition of the assets." *In re Retz*, 606 F.3d 1189, 1205
23 (9th Cir. 2010). "Once the creditor has made a *prima facie* case, the debtor must offer
24 credible evidence regarding the disposition of the missing assets." *Id.*

25 As previously noted, several years before her petition was filed, Defendant sold
26

27 ¹² See Plaintiff's post-trial brief filed May 10, 2023, Dk. 74, which is incorporated herein. For example,
28 Defendant testified that she did not pay rent to J-Sandcastle, despite having previously testified during
her deposition that she did pay rent. Trial Transcript, Dk. 72, Pg. 129. After some hesitation and
continued follow up questions from the Court, Defendant ultimately admitted that she lied at the
deposition about whether she paid rent to J-Sandcastle. Trial Transcript, Dk. 72, Pg. 130-131.

1 property for \$379,000. Trial Transcript, Dk. 72, Pg. 201. Thereafter, she spent a total of
2 \$165,000¹³ of the sale proceeds to purchase a mobile home, with \$214,000 remaining.
3 At trial, when asked about the disposition of the remaining \$214,000 in sale proceeds,
4 Defendant testified that she loaned \$175,000 of the \$214,000 to J-Sandcastle. Trial
5 Transcript, Dk. 72, Pg. 202. Defendant further testified that the remainder of the funds
6 were converted to cashier's checks that were ultimately paid to attorneys. Trial
7 Transcript, Dk. 72, Pg. 206. Defendant originally testified that she spent close to
8 \$150,000 on attorneys [Trial Transcript, Dk. 72, Pg. 206], despite scheduling only
9 \$113,700 on her bankruptcy schedules. Trial Transcript, Dk. 72, Pg. 207. At trial,
10 Defendant was unable to account for the approximately \$37,000 discrepancy. Trial
11 Transcript, Dk. 72, Pg. 207-209. When questioned about the discrepancy, Defendant
12 began to list other expenses that she incurred, including cosmetic and medical
13 procedures, which the Court perceived as being non-responsive to the question of
14 which attorneys were paid the remaining \$37,000. Trial Transcript, Dk. 72, Pg. 208.
15 Eventually, Defendant clarified that she "just threw out a number and said about
16 \$150,000," [Trial Transcript, Dk. 72, Pg. 210], and that she misspoke, stating again that
17 she spent the remaining funds on cosmetic and medical procedures.

18 Finding that Plaintiff had met its burden to demonstrate a *prima facie* case, and
19 that the entirety of Defendant's testimony on this matter was confusing and entirely
20 lacking in credibility, the Court provided the Debtor with the opportunity to file a
21 complete accounting by April 28, 2023, at 5 p.m. in order to explain further the
22 disposition of the pre-petition sale proceeds.

23 Defendant did not timely file a complete accounting by the deadline set by the
24 Court; however, Defendant did file an untimely declaration on May 1, 2023 [Dk. 71]
25 ("First Declaration"), and again on May 8, 2023 [Dk. 73] ("Second Declaration")
26 (together, "Declarations"). In the interest of justice, and in recognition that Defendant is
27

28 ¹³ Defendant testified that a cashier's check for \$20,000 (of the \$185,000 purchase price) was returned to
her, so the net cost of Defendant's purchase of the mobile home was \$165,000. Trial Transcript, Dk. 72,
Pg. 201.

1 a pro-se litigant without permissions to electronically file, the Court has considered the
2 Declarations despite the fact that they were untimely filed. Regrettably, they are
3 insufficient to adequately explain the disposition of Debtor's assets.

4 The Declarations contain a rudimentary and incomplete¹⁴ accounting which is
5 entirely unhelpful to the Court. The lists contained therein have no dates, partial
6 descriptions, and appear to be summary values (all ending in -.00). Moreover, the
7 Declarations are completely devoid of properly authenticated evidence.¹⁵ Lastly, even if
8 the foregoing issues were somehow resolved, the accounting provided is entirely
9 inconsistent with the testimony provided by Defendant at trial and in the Declarations
10 themselves.

11 For example, at trial, when asked about the disposition of the \$379,000 in sale
12 proceeds, Defendant testified that \$165,000 was spent on the mobile home, [Trial
13 Transcript, Dk. 72, Pg. 201], and \$175,000 of the remaining \$214,000 was paid to J-
14 Sandcastle. Trial Transcript, Dk. 72, Pg. 202. The accounting attached to Pg. 3 of the
15 First Declaration, which appears identical to the accounting attached to the Second
16 Declaration as Pg. 12, amounts to approximately \$190,000 in charges, but does not
17 include either the \$165,000 spent on the mobile home or the \$175,000 paid to J-
18 Sandcastle.¹⁶ It is not mathematically possible that Defendant used sale proceeds
19 totaling \$395,000 on a \$175,000 loan, a \$165,000 mobile home, and the \$190,000
20 contained in her accountings (all of which total \$530,000).

21 As noted above, Defendant was required to offer "credible evidence regarding
22 the disposition of the missing assets." *In re Retz*, 606 F.3d 1189, 1205 (9th Cir. 2010).

24 ¹⁴ Paragraph 5 of the Declarations state that: "THE LIST IS NOT AN EXHUASTIVE LIST OF THE SALE
25 PROCEEDS SPENT..." Declarations filed May 1, 2023, and May 8, 2023, Dks. 71 and 73 respectively.

26 ¹⁵ While Defendant attached various documents to the Second Declaration, the documents are
27 cumbersome, lack any explanation as to relevance, and are not properly authenticated by Defendant's
28 declaration. Pursuant to the Federal Rules of Evidence, in order "[t]o satisfy the requirement of
authenticating or identifying an item of evidence, the proponent must produce evidence sufficient to
support a finding that the item is what the proponent claims it is." Fed. Rules Evid. R 901. Defendant did
not do so.

¹⁶ \$395,000 less approximately \$190,000 = approximately \$205,000.

1 She has not met her burden. Therefore, Plaintiff is entitled to judgment against
2 Defendant on its § 727(a)(5) cause of action.

3 **IV. Conclusion**

4 For the reasons more fully explained herein, the Court finds good cause to enter
5 the following order DENYING the Motion to Amend, VACATING the hearing on the
6 Motion to Amend, and finding in favor of Plaintiff and against Defendant pursuant to 11
7 U.S.C. §§727(a)(2)(A), (a)(4), and (a)(5). Judgment, however, cannot yet be issued as
8 there remain pending § 523 claims. Accordingly, the Court hereby sets a status
9 conference on June 27, 2023, at 1:30 p.m., with a status report due 14 days in advance.
10 The status report must advise the Court how the parties wish to proceed in light of the
11 issuance of this Memorandum Decision.

12 **IT IS SO ORDERED.**

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25 Date: May 23, 2023



Scott C. Clarkson
United States Bankruptcy Judge

EXHIBIT 13

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7
8

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **SANTA ANA DIVISION**

12 In re
13 JAMIE LYNN GALLIAN,
14 Debtor.

Case No. 8:21-bk-11710-SC
Chapter 7
Adv. No.

15 JEFFREY I. GOLDEN, Chapter 7 Trustee,
16 Plaintiff,

17 vs.

18 J-SANDCASTLE CO., LLC; J-PAD LLC;
STEVEN D. GALLIAN; BRIAN J.
19 GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
20 AND E. J. GALLIAN,

21 Defendants.
22

CHAPTER 7 TRUSTEE'S COMPLAINT:
(1) TO AVOID AND RECOVER
FRAUDULENT TRANSFERS; (2) TO
AVOID AND RECOVER POSTPETITION
TRANSFERS; (3) FOR DECLARATORY
RELIEF; (4) FOR BREACH OF
CONTRACT; (5) FOR MONEY HAD AND
RECEIVED; AND (6) UNJUST
ENRICHMENT

Date: [SEE SUMMONS]
Time: [SEE SUMMONS]
Place: [SEE SUMMONS]

23 Plaintiff alleges:

24 **JURISDICTION**

25 1. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C.
26 §§ 157(b) and 1334(b). This action is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A),
27 (E), (H), (K), and (O). This adversary proceeding is brought pursuant to 11 U.S.C. §§ 542, 544,
28 548, 549, 550 and 551 and Rule 7001 of the Federal Rules of Bankruptcy Procedure. This

adversary proceeding arises in and under and relates to the bankruptcy case under Chapter 7 of the Bankruptcy Code (the “Code”) entitled *In Jamie Lynn Gallian*, Case No. 8:21-bk-11710-SC (the “Bankruptcy Case”), which is presently pending before the United States Bankruptcy Court for the Central District of California, Santa Ana Division. Plaintiff consents to and the Court can and should enter a final judgment herein. If and to the extent that the Court determines that it lacks jurisdiction or authority to enter a final judgment, Plaintiff requests that the Court submit findings of fact and conclusions of law for consideration by the District Court.

PARTIES

2. Plaintiff in this adversary proceeding is Jeffrey I. Golden, the Chapter 7 trustee (“Plaintiff” or the “Trustee”) of the bankruptcy estate of Jamie Lynn Gallian, the debtor in the Bankruptcy Case (the “Debtor”). Plaintiff brings this adversary proceeding solely in his capacity as the Chapter 7 Trustee of the Debtor’s bankruptcy estate.

3. Plaintiff is informed and believes, and based thereon alleges, that J-Sandcastle Co., LLC (“J-Sandcastle”) was a California limited liability company, with its principal place of business located in in the County of Orange, State of California. The Debtor is the sole member and manager of J-Sandcastle.

4. Plaintiff is informed and believes, and based thereon alleges, that J-Pad LLC (“J-Pad”) was a California limited liability company, with its principal place of business located in in the County of Orange, State of California. The Debtor is the sole member and manager of J-Pad.

5. Plaintiff is informed and believes, and based thereon alleges, that Steven D. Gallian is an individual residing in the County of Orange, State of California. Plaintiff is further informed and believes that Steven D. Gallian is the Debtor’s son.

6. Plaintiff is informed and believes, and based thereon alleges, that Brian J. Gallian is an individual residing in the County of Orange, State of California. Plaintiff is further informed and believes that Brian J. Gallian is the Debtor’s son.

7. Plaintiff is informed and believes, and based thereon alleges, that E. J. Gallian is an individual residing in the County of Orange, State of California. Plaintiff is further informed and believes that E. J. Gallian is the Debtor's granddaughter.

8. Plaintiff is informed and believes, and based thereon alleges, that Justin Barclay is an individual residing in the County of Orange, State of California. Plaintiff is further informed and believes that Justin Barclay is the Debtor's son.

9. Plaintiff is informed and believes, and based thereon alleges, that Ronald J. Pierpont is an individual residing in the County of Orange, State of California. Plaintiff is further informed and believes that Ronald J. Pierpont is the Debtor's ex-husband.

10. Plaintiff is informed and believes, and based thereon alleges, that Robert J. McLelland is an individual residing in the County of Orange, State of California. Plaintiff is further informed and believes that Robert J. McLelland is the Debtor's roommate.

11. Plaintiff is further informed and believes, and based thereon alleges, that J-Sandcastle, J-Pad, Steven Gallian, Brian Gallian, Justin Barclay, and Ronald Pierpont are all “insiders” of the Debtor pursuant to § 101(31) of the Code.

GENERAL ALLEGATIONS

12. On or about July 9, 2021 (the “Petition Date”), the Debtor commenced this case by filing a voluntary petition for relief under Chapter 7 of the Code.

13. Jeffrey I. Golden thereafter accepted appointment as the Chapter 7 trustee for the Debtor's bankruptcy estate and continues to serve in that capacity for the benefit of creditors.

The J-Sandcastle Transfer

14. Up to and until about October 31, 2018, the Debtor lived at 4476 Alderport Drive, Unit 53, Huntington Beach, CA 92649 (“Alderport Property”), which she received as a gift in 2017 from her stepmother, Sandra Bradley (“Ms. Bradley”). The Debtor always held title to the Alderport Property in her own name.

15. On or about October 31, 2018, the Debtor sold the Alderport Property to Randall Nickell for \$379,000, which he paid for in two cashier's checks payable to the Debtor, individually.

1 16. The Debtor deposited the funds from Mr. Nickell for the Alderport Property into a
2 Chase Bank account in her name.

3 17. Thereafter, the Debtor used \$185,000 of the proceeds from the sale of the Alderport
4 Property to purchase a manufactured home located at 16222 Monterey Lane, Space #376,
5 Huntington Beach, CA 92649 (the “Property”) from Lisa Ryan.

6 18. The Debtor paid Ms. Ryan the first \$10,000 on November 1, 2018, and the \$175,000
7 balance of the purchase price for the Property on November 17, 2018.

8 19. Even though the Debtor paid for the Property with proceeds of her Alderport
9 Property deposited into a bank account in her own name, the Debtor transferred title to, and the
10 beneficial interest in, the Property to J-Sandcastle.

11 20. At the time Debtor transferred the Property to J-Sandcastle, she was being sued in
12 multiple actions and judgments were later entered against her as follows:

13 a. On November 8, 2018, in Case No. 30-2017-00913985, the Orange County
14 Superior Court (“OCSC”) granted a motion by the Huntington Beach Gables Homeowners
15 Association (“HOA”) for attorney’s fees against the Debtor, and on December 4, 2018, the OCSC
16 entered an order on the motion, which reflected that the HOA had been awarded \$46,138 of
17 attorney’s fees against the Debtor, plus interest.

18 b. On May 6, 2019, in Case No. 30-2017-00913985, the HOA obtained
19 judgment against the Debtor in excess of \$315,000.

20 c. On September 27, 2018, in Case No. 30-2017-00962999, the OCSC imposed
21 \$3,070 of sanctions against the Debtor.

22 d. On March 21, 2019, in Case No. 30-2017-00962999, the HOA obtained a
23 money judgment against the Debtor for \$9,265.

24 e. To date, the Debtor has paid approximately \$1,295 on account of all these
25 judgments and orders.

26 21. On November 1, 2018, Ms. Ryan executed a “Notice of Sale or Transfer” for the
27 Property with the Debtor, “Jamie Lynn Gallian,” identified as the “Purchaser/New Owner.”

28 22. On November 15, 2018, however, Ms. Ryan whited-out the Debtor’s name and

1 replaced it with “J-Sandcastle Co, LLC Its Manager Jamie L. Gallian,” pursuant to a discussion the
2 Debtor and Ms. Ryan had on that day (the “First J-Sandcastle Transfer”).

3 23. The fully executed “Notice of Sale or Transfer” of the Property reflecting that J-
4 Sandcastle was the owner of the Property was transmitted to the California Department of Housing
5 and Community Development (the “HCD”), which handles the registering and titling of
6 manufactured and mobilehomes, on or about November 20, 2018 (the “Second J-Sandcastle
7 Transfer”). The First J-Sandcastle Transfer and Second J-Sandcastle Transfer are, collectively, the
8 “J-Sandcastle Transfers”.

9 24. J-Sandcastle paid no consideration to the Debtor for the J-Sandcastle Transfers or in
10 connection with receiving title to and the beneficial interest in the Property. J-Sandcastle did not
11 have any business other than its ownership of the Property.

12 25. On the Petition Date, title to the Property remained with J-Sandcastle, and not the
13 Debtor.

14 26. On or about July 28, 2021 (postpetition), however, the Debtor caused J-Sandcastle
15 to transfer title to herself personally. Accordingly, as of August 10, 2021, the HCD records were
16 changed to reflect that the Property’s registered owner was “Jamie Lynn Gallian”. By receiving
17 this transfer from J-Sandcastle, the Debtor is a subsequent transferee that did not take for value, in
18 good faith, and without knowledge of the voidability of the initial fraudulent transfer to J-
19 Sandcastle.

20 The J-Pad Transfers

21 27. At about the time that the Debtor purchased the Property, she sought to conceal the
22 equity in the Property by granting a lien for \$225,000 on the Property in favor of J-Pad.

23 28. Accordingly, on November 16, 2018, the Debtor, as the sole member of J-
24 Sandcastle the “borrower”, executed a secured promissory note in the amount of \$225,000 in favor
25 of J-Pad. The secured promissory note is secured by a separate security agreement dated
26 November 16, 2018, reflecting a security interest in the Property between J-Sandcastle and J-Pad
27 (the “First J-Pad Transfer”).

28 29. In addition, on November 16, 2018, the Debtor, individually as the “borrower”, also

1 executed a secured promissory note in the amount of \$225,000 in favor of J-Pad. The secured
2 promissory note with the Debtor also purports to be secured by a separate security agreement dated
3 November 16, 2018, between the Debtor and J-Pad (the “Second J-Pad Transfer”). It is unknown if
4 the separate security agreement exists.

5 30. Notwithstanding that the secured promissory notes were for \$225,000, J-Sandcastle
6 did not advance or loan any money to J-Pad at any point in time. The Debtor, however, advanced
7 \$175,000 to J-Pad at about the time of the First J-Pad Transfer, with the balance of \$50,000 coming
8 from the Debtor later (collectively, the “Third J-Pad Transfer”).

9 31. Despite the two secured promissory notes, the \$225,000 was not owed to J-Pad.
10 Rather, the \$225,000 was owed by J-Pad to the Debtor (who had in fact advanced the funds from
11 her personal accounts).

12 32. On January 14, 2019, the Debtor individually and through J-Pad filed not less than
13 three UCC-1 Financing Statements with the California Secretary of State listing J-Pad as the
14 secured party and the collateral as the Property (collectively, the “Fourth J-Pad Transfer”). A UCC
15 filing failed to perfect liens against the Property.

16 33. Thereafter, on August 20, 2020, the Debtor signed a “Statement to Encumber” that
17 was submitted to the HCD to add the Debtor’s ex-husband, Ronald J. Pierpont, and J-Pad as
18 lienholders on the certificate of title for the Property (the “Fifth J-Pad Transfer”).

19 34. Thereafter, as of February 24, 2021, the certificate of title to the Property reflected
20 that Mr. Pierpont and J-Pad were the “legal owners” (i.e., the lienholders) on the Property.

21 35. On or about July 9, 2021, however, Mr. Pierpont submitted a signed “Lien
22 Satisfied” form to the HCD removing Mr. Pierpont and J-Pad as the lienholders on the Property.

23 36. Thereafter, as of August 3, 2021, the certificate of title to the Property did not reflect
24 any “legal owners” (i.e., lienholders) on the Property.

25 37. On or about August 6, 2021 (postpetition), the Debtor, individually, signed and
26 submitted a “Statement of Facts” to the HCD stating that the legal owner of the Property was J-Pad
27 and that J-Pad perfected its lien on January 14, 2019 (the “Sixth J-Pad Transfer”).

28 38. The Debtor also submitted with the August 6, 2021, Statement of Facts a “Statement

1 to Encumber” purportedly signed on January 14, 2019, reflecting that the “legal owner” of the
2 Property was only J-Pad (the “Seventh J-Pad Transfer”).

3 39. The First, Second, Third, Fourth, Fifth, Sixth, and Seventh J-Pad Transfers are
4 collectively referred to as the “J-Pad Transfers”.

5 40. J-Pad paid no consideration for the J-Pad Transfers.

6 The Steven and Brian Gallian Transfers

7 41. On August 20, 2020, the Debtor, as the member of J-Sandcastle, signed a
8 “Statement to Encumber” that was submitted to the HCD to add her sons Steven Gallian and Brian
9 Gallian as legal owners (i.e., lienholders) on the certificate of title for the Property (the “First
10 Steven and Brian Transfer”).

11 42. In addition, on December 4, 2020, the Debtor, as the member of J-Pad, filed a UCC
12 Financing Statement Amendment (UCC3) with the California Secretary of State listing Steven and
13 Brian Gallian as additional secured parties with respect to the Property (the “Second Steven and
14 Brian Transfer”). The UCC filings failed to perfect liens against the Property. The First Steven and
15 Brian Transfer and the Second Steven and Brian Transfer are collectively, the “Steven and Brian
16 Transfers”.

17 43. Steven and Brian Gallian paid no consideration for the Steven and Brian Transfers.

18 Additional Postpetition Liens

19 44. In addition to the UCC Financing Statement Amendment (UCC3) filed on
20 December 4, 2020, with respect to Steven and Brian Gallian, on September 8, 2021, September 12,
21 2021, and September 24, 2021, the Debtor, individually and/or through J-Pad or J-Sandcastle,
22 purported to perfect or create additional liens on the Property in favor of J-Pad, Steven Gallian,
23 Brian Gallian, Justin Barclay, Ronald J. Pierpont, Robert J. McLelland, and E. J. Gallian by filing
24 multiple UCC Financing Statement Amendments (UCC3) with the California Secretary of State
25 listing J-Pad, Steven Gallian, Brian Gallian, Justin Barclay, Mr. Pierpont, Robert J. McLelland, and
26 E. J. Gallian as additional secured parties (collectively, the “Postpetition Transfers”). The UCC
27 filings failed to perfect liens against the Property.

28 45. J-Pad, Steven Gallian, Brian Gallian, Justin Barclay, Mr. Pierpont, Robert J.

1 McLelland, and E. J. Gallian paid no consideration for Postpetition Transfers or to be added as
2 additional secured parties with respect to the Property.

3 46. The J-Sandcastle Transfers, J-Pad Transfers, Steven and Brian Transfers, and the
4 Postpetition Transfers are collectively referred to as the “Transfers”.

5 47. The Trustee is informed and believes, and based thereon alleges, that on the Petition
6 Date, there existed in this case one or more creditors holding unsecured claims allowable under
7 § 502 of the Code or that are not allowable only under § 502(e), that could have avoided the
8 Transfers under applicable law.

9
10 **FIRST CLAIM FOR RELIEF**

11 **(To Avoid and Recover Fraudulent Transfers under 11 U.S.C. §§ 544(b) and/or 548 and 550,**
12 **and California Civil Code §§ 3439.04, 3439.07 and 3439.08)**

13 **(Against All Defendants)**

14 48. Plaintiff refers to and incorporates herein by reference each and every allegation
15 contained in paragraphs 1 through 47, inclusive, of this Complaint as though fully set forth herein.

16 49. Plaintiff is informed and believes, and based thereon alleges, that the Debtor made
17 the Transfers with the actual intent to hinder, delay, or defraud one or more of her creditors.

18 50. Pursuant to 11 U.S.C. §§ 544 and/or 548, California Civil Code § 3439.04(a), and
19 other applicable law, Plaintiff is entitled to avoid the Transfers as not being perfected or as
20 fraudulent.

21 51. Pursuant to Section 550(a) of the Bankruptcy Code, Plaintiff may recover the
22 Transfers from the initial transferees and any subsequent transferees.

23 52. Specifically, Plaintiff may recover the Property from J-Sandcastle, or the value
24 thereof, plus interest thereon at the maximum legal rate.

25 53. Additionally, Plaintiff may recover the Third J-Pad Transfer (i.e., \$225,000) from J-
26 Pad, plus interest thereon at the maximum legal rate.

27 54. Pursuant to the provisions of § 550 and § 551 of the Bankruptcy Code, all avoided
28 Transfers, including title to and liens against the Property, are preserved for the benefit of the

Debtor's estate.

SECOND CLAIM FOR RELIEF

**(To Avoid and Recover Fraudulent Transfers under 11 U.S.C. §§ 544(b) and/or 548 and 550,
and California Civil Code §§ 3439.05, 3439.07 and 3439.08)
(Against All Defendants)**

55. Plaintiff refers to and incorporates herein by reference each and every allegation contained in paragraphs 1 through 47, inclusive, of this Complaint as though fully set forth herein.

56. Plaintiff is informed and believes, and based thereon alleges, that the Debtor received less than a reasonably equivalent value in exchange for the Transfers.

57. Plaintiff is informed and believes, and based thereon alleges, that at the time the Transfers were made, the Debtor was either insolvent or became insolvent as a result of the Transfers.

58. Pursuant to Sections 544(b) and/or 548 of the Bankruptcy Code, California Civil Code California Civil Code §§ 3439.05 and 3439.07, and other applicable law, Plaintiff is entitled to avoid the Transfers as not being properly perfected or as fraudulent.

59. Pursuant to Section 550(a) of the Bankruptcy Code, Plaintiff may recover the Transfers from the initial transferees and any subsequent transferees.

60. Specifically, Plaintiff may recover the Property from J-Sandcastle, or the value thereof, plus interest thereon at the maximum legal rate.

61. Additionally, Plaintiff may recover the Third J-Pad Transfer (i.e., \$225,000) from J-Pad, plus interest thereon at the maximum legal rate.

62. Pursuant to the provisions of § 550 and § 551 of the Bankruptcy Code, all avoided Transfers, including title to and liens against the Property, are preserved for the benefit of the Debtor's estate.

THIRD CLAIM FOR RELIEF

**(To Avoid and Recover Fraudulent Transfers under 11 U.S.C. §§ 544(b) and/or 548 and 550,
and California Civil Code §§ 3439.04(a), 3439.07, and 3439.08)**

(Against all Defendants)

63. Plaintiff refers to and incorporates herein by reference each and every allegation contained in paragraphs 1 through 47, inclusive, and paragraph 56, of this Complaint as though fully set forth herein.

64. Plaintiff alleges that at the time of the Transfers, the Debtor was engaged, or was about to engage, in business or a transaction or transactions for which her remaining assets were unreasonably small in relation to the business or transaction.

65. Pursuant to Sections 544(b) and/or 548 of the Bankruptcy Code, California Civil Code California Civil Code §§ 3439.05 and 3439.07, and other applicable law, Plaintiff is entitled to avoid the Transfers as either not being properly perfected or as fraudulent.

66. Pursuant to Section 550(a) of the Bankruptcy Code, Plaintiff may recover the Transfers from the initial transferees and any subsequent transferees.

67. Specifically, Plaintiff may recover the Property from J-Sandcastle, or the value thereof, plus interest thereon at the maximum legal rate.

68. Additionally, Plaintiff may recover the Third J-Pad Transfer (i.e., \$225,000) from J-Pad, plus interest thereon at the maximum legal rate.

69. Pursuant to the provisions of § 550 and § 551 of the Bankruptcy Code, all avoided Transfers, including title to and liens against the Property, are preserved for the benefit of the Debtor's estate.

FOURTH CLAIM FOR RELIEF

**(To Avoid and Recover Fraudulent Transfers under 11 U.S.C. §§ 544(b) and/or 548 and 550,
and California Civil Code §§ 3439.04(a), 3439.07, and 3439.08)**

(Against all Defendants)

70. Plaintiff refers to and incorporates herein by reference each and every allegation

1 contained in paragraphs 1 through 47, inclusive, and paragraph 56, of this Complaint as though
2 fully set forth herein.

3 71. Plaintiff alleges that the Debtor intended to incur, or believed or reasonably should
4 have believed that she would incur, debts that would be beyond her ability to pay as such debts
5 became due.

6 72. Pursuant to Sections 544(b) and/or 548 of the Bankruptcy Code, California Civil
7 Code California Civil Code §§ 3439.04(a) and 3439.07, and other applicable law, Plaintiff is
8 entitled to avoid the Transfers as either not being properly perfected or as fraudulent.

9 73. Pursuant to Section 550(a) of the Bankruptcy Code, Plaintiff may recover the
10 Transfers from the initial transferees and any subsequent transferees.

11 74. Specifically, Plaintiff may recover the Property from J-Sandcastle, or the value
12 thereof, plus interest thereon at the maximum legal rate.

13 75. Additionally, Plaintiff may recover the Third J-Pad Transfer (i.e., \$225,000) from J-
14 Pad, plus interest thereon at the maximum legal rate.

15 76. Pursuant to the provisions of § 550 and § 551 of the Bankruptcy Code, all avoided
16 Transfers, including title to and liens against the Property, are preserved for the benefit of the
17 Debtor's estate.

18
19 **FIFTH CLAIM FOR RELIEF**

20 **(To Avoid and Recover Postpetition Transfers under 11 U.S.C. § 549(a))**

21 **(Against All Defendants)**

22 77. Plaintiff hereby incorporates by this reference all of his allegations in Paragraphs
23 1 through 76, inclusive, of this Complaint as though fully set forth herein.

24 78. The Sixth J-Pad Transfer, Seventh J-Pad Transfer, and the Postpetition Transfers
25 were not authorized under the Bankruptcy Code or by the Court.

26 79. Pursuant to § 549 of the Code, the Trustee is entitled to avoid the Sixth J-Pad
27 Transfer, Seventh J-Pad Transfer, and the Postpetition Transfers.

28 80. Pursuant to the provisions of § 550 and § 551 of the Bankruptcy Code, any liens

1 relating to Sixth J-Pad Transfer, Seventh J-Pad Transfer, and the Postpetition Transfers are
2 preserved for the benefit of the Debtor's estate.

3
4 **SIXTH CLAIM FOR RELIEF**

5 **(For Declaratory Relief)**

6 **(Against All Defendants)**

7 81. Plaintiff hereby incorporates by this reference all of his allegations in Paragraphs
8 1 through 80, inclusive, of this Complaint as though fully set forth herein.

9 82. An actual controversy exists in that Plaintiff contends that the Defendants do not
10 have valid, perfected, and unavoidable liens on the Property.

11 83. Pursuant to 11 U.S.C. § 544(a)(2) and other applicable law, the Trustee is entitled to
12 a judgment determining that the Defendants do not have valid, perfected, and unavoidable liens on
13 the Property.

14
15 **SEVENTH CLAIM FOR RELIEF**

16 **(For Turnover – 11 U.S.C. § 542)**

17 **(Against all Defendants)**

18 84. Plaintiff refers to and incorporates herein by reference each and every allegation
19 contained in paragraphs 1 through 83, inclusive, of this Complaint as though fully set forth herein.

20 85. Upon avoidance, recovery, and preservation, the Property will be property of the
21 Debtor's bankruptcy estate.

22 86. The Trustee may use, sell, or lease the Property under 11 U.S.C. § 363.

23 87. Pursuant to 11 U.S.C. § 542, the Trustee is entitled to the turnover by the
24 Defendants of the Property.

EIGHTH CLAIM FOR RELIEF

(For Breach of Contract)

(Against J-Pad)

88. Plaintiff refers to and incorporates herein by reference each and every allegation contained in paragraphs 1 through 87, inclusive, of this Complaint as though fully set forth herein.

89. Plaintiff alleges that the Debtor loaned \$225,000 to J-Pad.

90. Plaintiff alleges that the Debtor performed all of the terms and obligations on her part to be performed with respect to the terms of such loan.

91. Plaintiff alleges that J-Pad has defaulted under the terms of the loan including, without limitation, its failure to repay all amounts owed.

92. As of the date hereof, the outstanding principal balance owed to the Debtor by J-Pad is \$225,000, plus interest.

NINTH CLAIM FOR RELIEF

(To Avoid Unjust Enrichment)

(Against J-Pad)

93. Plaintiff refers to and incorporates herein by reference each and every allegation contained in paragraphs 1 through 92, inclusive, of this Complaint as though fully set forth herein.

94. Plaintiff alleges that as a result of the J-Pad Transfers, J-Pad has been unjustly enriched, so that Plaintiff is entitled to recover from J-Pad money, in a sum of not less than \$225,000, plus interest.

TENTH CLAIM FOR RELIEF

(To Avoid Unjust Enrichment)

(Against J-Pad)

95. Plaintiff refers to and incorporates herein by reference each and every allegation contained in paragraphs 1 through 94, inclusive, of this Complaint as though fully set forth herein

96. J-Pad owes the Debtor the principal sum of \$225,000 for money had and received

1 by J-Pad from the Debtor.

2 97. The Trustee is entitled to recover damages from J-Pad in the sum of not less than
3 \$225,000, plus interest.

4
5 WHEREFORE, the Plaintiff prays for judgment against the Defendants as follows:

6 ON THE FIRST THROUGH FOURTH CLAIMS FOR RELIEF:

7 1. For judgment in favor of the Plaintiff and against the Defendants avoiding the
8 Transfers;

9 2. For a judgment in favor of the Plaintiff and against all transferees for the Trustee to
10 recover the transferred property;

11 3. For a judgment in favor of the Plaintiff and against J-Sandcastle for the Trustee to
12 recover the Property from J-Sandcastle;

13 4. For a judgment in favor of the Plaintiff and against J-Pad for the Trustee to recover
14 the Third J-Pad Transfer (i.e., \$225,000) from J-Pad;

15 5. For a judgment in favor of the Plaintiff and against the Defendants preserving any
16 avoided Transfers, including title to and liens against the Property, for the benefit of the Debtor's
17 estate.

18 6. For an award of interest at the legal rate on all sums awarded to Plaintiff from
19 and after the date of the Transfers.

20 ON THE FIFTH CLAIM FOR RELIEF:

21 7. For judgment in favor of the Plaintiff and against the Defendants avoiding and
22 recovering the Sixth J-Pad Transfer, Seventh J-Pad Transfer, and the Postpetition Transfers;

23 8. For a judgment in favor of the Plaintiff and against the Defendants preserving any
24 liens relating to the J-J-Pad Transfers, Steven and Brian Transfers, and the Postpetition Transfers
25 for the benefit of the Debtor's estate.

26 ON THE SIXTH CLAIM FOR RELIEF:

27 9. For a judgment determining that the Defendants do not have valid liens on the
28 Property.

1 ON THE SEVENTH CLAIM FOR RELIEF:

2 10. For a judgment for turnover of the Property to the Trustee.

3 ON THE EIGHTH, NINTH, AND TENTH CLAIMS FOR RELIEF:

4 11. For the sum of \$225,000, together with interest thereon as allowed by contract and
5 law.

6 ON ALL CLAIMS FOR RELIEF:

7 12. For costs of suit incurred herein; and

8 13. For all other and further relief as the Court deems just and proper.

9
10 DATED: June 30, 2023

DANNING, GILL, ISRAEL & KRASNOFF, LLP

11
12 By: /s/ Aaron E. de Leest

13 AARON E. DE LEEST

14 Attorneys for Plaintiff Jeffrey I. Golden, Chapter 7
Trustee
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B1040 (FORM 1040) (12/15)

ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		ADVERSARY PROCEEDING NUMBER (Court Use Only)		
PLAINTIFFS JEFFREY I. GOLDEN, Chapter 7 Trustee	DEFENDANTS J-SANDCASTLE CO., LLC; J-PAD LLC; STEVEN D. GALLIAN; BRIAN J. GALLIAN; JUSTIN BARCLAY; RONALD J. PIERPONT; ROBERT J. MCLELLAND; AND E. J. GALLIAN			
ATTORNEYS (Firm Name, Address, and Telephone No.) DANNING, GILL, ISRAEL & KRASNOFF, LLP 1901 AVENUE OF THE STARS, SUITE 450 LOS ANGELES, CA 90067-6006 310-277-0077	ATTORNEYS (If Known)			
PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input checked="" type="checkbox"/> Trustee	PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee			
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) (1) TO AVOID AND RECOVER FRAUDULENT TRANSFERS; (2) TO AVOID AND RECOVER POSTPETITION TRANSFERS; (3) FOR DECLARATORY RELIEF; (4) FOR BREACH OF CONTRACT; (5) FOR MONEY HAD AND RECEIVED; AND (6) UNJUST ENRICHMENT				
NATURE OF SUIT (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)				
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input checked="" type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input checked="" type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div> </td> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input checked="" type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case) </td> </tr> </table>			FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input checked="" type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input checked="" type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div>	FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input checked="" type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)
FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input checked="" type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input checked="" type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div>	FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input checked="" type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)			
<input type="checkbox"/> Check if this case involves a substantive issue of state law	<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23			
<input type="checkbox"/> Check if a jury trial is demanded in complaint	Demand \$ 225,000			
Other Relief Sought				

B1040 (FORM 1040) (12/15)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR JAMIE LYNN GALLIAN		BANKRUPTCY CASE NO. 8:21-bk-11710-SC
DISTRICT IN WHICH CASE IS PENDING CENTRAL	DIVISION OFFICE SANTA ANA	NAME OF JUDGE SCOTT C. CLARKSON
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF) /s/ Aaron E. de Leest		
DATE JUNE 30, 2023	PRINT NAME OF ATTORNEY (OR PLAINTIFF) Aaron E. de Leest	

INSTRUCTIONS

The filing of a bankruptcy case creates an “estate” under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor’s discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court’s Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff’s attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

EXHIBIT 14

[illegible]

You must comply with LBR 7016-1, which requires you to file a joint status report and to appear at a status conference. All parties must read and comply with the rule, even if you are representing yourself. You must cooperate with the other parties in the case and file a joint status report with the court and serve it on the appropriate parties at least 14 days before a status conference. A court-approved joint status report form is available on the court's website (LBR form F 7016-1.STATUS.REPORT) with an attachment for additional parties if necessary (LBR form F 7016-1.STATUS.REPORT.ATTACH). If the other parties do not cooperate in filing a joint status report, you still must file with the court a unilateral status report and the accompanying required declaration instead of a joint status report 7 days before the status conference. **The court may fine you or impose other sanctions if you do not file a status report. The court may also fine you or impose other sanctions if you fail to appear at a status conference.**

KATHLEEN J. CAMPBELL
CLERK OF COURT

Date of Issuance of Summons and Notice of Status Conference in Adversary Proceeding: July 3, 2023

By: "s/" Nickie Bolte
Deputy Clerk



This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

ATTACHMENT A
Names of plaintiffs and defendants

Plaintiff(s): Jeffrey I. Golden	Defendant(s): J-Sandcastle Co LLC J-Pad LLC Justin Barclay Steven D Gallian Ronald J. Pierpont Ronald J. McClelland E. J. Gallian Brian J. Gallian
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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

ATTACHMENT A

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1901 Avenue of the Stars, Suite 450, Los Angeles, California 90067.

A true and correct copy of the foregoing document entitled: **SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]** and (2) the accompanying pleading(s) entitled: **ORDER RE: RULE 26(f) MEETING, INITIAL DISCLOSURES, AND SCHEDULING CONFERENCE; and CHAPTER 7 TRUSTEE'S COMPLAINT: (1) TO AVOID AND RECOVER FRAUDULENT TRANSFERS; (2) TO AVOID AND RECOVER POSTPETITION TRANSFERS; (3) FOR DECLARATORY RELIEF; (4) FOR BREACH OF CONTRACT; (5) FOR MONEY HAD AND RECEIVED;** ** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) July 6, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On (date) July 6, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

****AND (6) UNJUST ENRICHMENT**

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 6, 2023
Date

Beverly Lew
Printed Name

/s/ Beverly Lew
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

December 2016

F 7004-1.SUMMONS.ADV.PROC

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

Aaron E. DE Leest on behalf of Plaintiff Jeffrey I. Golden
adeleest@DanningGill.com, danninggill@gmail.com;adeleest@ecf.inforuptcy.com

Robert P Goe on behalf of Interested Party The Huntington Beach Gables Homeowners
Association
kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com

Jeffrey I Golden (TR)
lwerner@go2.law, jig@trustesolutions.net;kadele@go2.law;C205@ecfcbis.com

United States Trustee (SA)
ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

J-Sandcastle Co., LLC
Jamie Lynn Gallian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

J-Pad LLC
Jamie Lynn Gallian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

Steven Gallian
2633 Luminous Lane
Costa Mesa, CA 92626

Brian Gallian
924 Junipero Drive
Costa Mesa, CA 92626

Justin Barclay
2407 N Driftwood Avenue
Rialto, CA 92377

Ronald J. Pierpont
4519 Ponderosa Way
Yorba Linda, CA 92886

Robert J. McLelland
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

E. J. Gallian and Brian Gallian
924 Junipero Drive
Costa Mesa, CA 92626

The Honorable Scott C. Clarkson
U.S. Bankruptcy Court
411 W. Fourth Street, Suite 5130
Santa Ana, CA 92701

EXHIBIT 15

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 LAILA MASUD, #311731
lmasud@marshackhays.com
3 BRADFORD N. BARNHARDT, #328705
bbarnhardt@marshackhays.com
4 MARSHACK HAYS LLP
870 Roosevelt
Irvine, CA 92620
5 Telephone: (949) 333-7777
Facsimile: (949) 333-7778
6

7 Attorneys for Plaintiff,
HOUSER BROS. CO. dba RANCHO DEL
8 REY MOBILE HOME ESTATES

9 UNITED STATES BANKRUPTCY COURT

10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

11 In re

12 JAMIE LYNN GALLIAN,

13 Debtor.

14 HOUSER BROS. CO. dba RANCHO DEL REY
15 MOBILE HOME ESTATES,

16 Plaintiff,

17 v.

18 JAMIE LYNN GALLIAN,

19 Defendant.
20
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Case No. 8:21-bk-11710-SC

Chapter 7

Adv. No. 8:21-ap-01097-SC

JUDGMENT DENYING DEBTOR'S
DISCHARGE PURSUANT TO 11 U.S.C.
§§ 727(a)(2)(A), (a)(4), AND (a)(5)

Trial:

Date: April 26, 2023

Time: 9:30 a.m.

Courtroom: 5C

FILED & ENTERED

JUL 07 2023

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY bolte DEPUTY CLERK

22 On April 26, 2023, a trial was held in the above captioned adversary proceeding (“April 26
23 Trial”) on Plaintiff’s three claims pursuant to 11 U.S.C. § 727. D. Edward Hays, Esq. and Bradford
24 N. Barnhardt, Esq. appeared on behalf of Plaintiff Houser Bros. Co. dba Rancho Del Rey Mobile
25 Home Estates (“Plaintiff”), as did Chris Houser, who appeared and testified as Plaintiff’s
26 representative. Greg Buysman was also called as a witness by Plaintiff. Defendant, Jamie Lynn
27 Gallian (“Defendant” or “Debtor”), appeared pro se and testified. All parties were afforded an
28 opportunity to cross-examine witnesses. Plaintiff and Defendant were permitted the opportunity to

1 present evidence in support of their case and defense. Witnesses were sworn and testimony and
2 documentary evidence was received and admitted into evidence.

3 The Court having heard the testimony and oral argument, having examined the evidence
4 offered by the parties and admitted into evidence, and having reviewed the parties' briefs, as well as
5 Defendant's post-trial declaration filed on May 1, 2023, as Dk. No. 71, and based upon all the
6 evidence, and for the reasons set forth in the Court's Memorandum Decision After Trial Regarding
7 § 727 Claims, entered on May 23, 2023, as Dk. No. 81, the Court has determined that cause exists
8 for Defendant's discharge to be denied. Pursuant to a separate order entered by the Court after a
9 status conference held on June 27, 2023, the Court found that good cause exists and that there is no
10 just reason for delay in entering a final judgment denying Debtor's discharge under 11 U.S.C. § 727
11 pursuant to Rule 54(b) of the Federal Rules of Civil Procedure applicable here pursuant to Rule
12 7054(a) of the Federal Rules of Bankruptcy Procedure. Accordingly, the Court enters final Judgment
13 in favor of Plaintiff as follows:

14 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Judgment is entered in
15 favor of Plaintiff and against Defendant on the Third Claim for Relief and that Debtor's discharge is
16 denied pursuant to 11 U.S.C. § 727(a)(2)(A);

17 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Judgment is entered in
18 favor of Plaintiff and against Defendant on the Fourth Claim for Relief and that Debtor's discharge
19 is denied pursuant to 11 U.S.C. § 727(a)(4); and

20 ///

21 ///

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Judgment is entered in
2 favor of Plaintiff and against Defendant on the Fifth Claim for Relief and that Debtor's discharge is
3 denied pursuant to 11 U.S.C. § 727(a)(5).

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23 Date: July 7, 2023



Scott C. Clarkson
United States Bankruptcy Judge

EXHIBIT 16

United States Bankruptcy Court Central District of California 411 West Fourth Street, Suite 2030, Santa Ana, CA 92701-4593	
In re: Jamie Lynn Gallian <div style="text-align: right;">Debtor(s).</div>	BANKRUPTCY CASE NO.: 8:21-bk-11710-SC CHAPTER NO.: 7
Jeffrey I. Golden <div style="text-align: right;">Plaintiff(s)</div> Versus J-Sandcastle Co LLC (See Attachment A for names of additional defendants) <div style="text-align: right;">Defendant(s)</div>	ADVERSARY NO.: 8:23-ap-01064-SC

**NOTICE THAT CLERK HAS ENTERED DEFAULT AGAINST DEFENDANT(S)
UNDER LOCAL BANKRUPTCY RULE 7055-1(a)**

On August 21, 2023, a request was filed for the clerk to enter default against defendant(s) J-Pad, LLC.

Having reviewed the request, the clerk hereby enters default as requested.

For the Court,

KATHLEEN J. CAMPBELL, CLERK OF COURT

By: Nickie Bolte
Deputy Clerk

Dated: August 22, 2023

ATTACHMENT A
Names of plaintiffs and defendants

Plaintiff(s): Jeffrey I. Golden	Defendant(s): J-Sandcastle Co LLC J-Pad LLC Justin Barclay Steven D Gallian Ronald J. Pierpont Robert J. McLelland E. J. Gallian Brian J. Gallian
---	--

EXHIBIT A

ERIC P. ISRAEL (State Bar No. 132426)
eisrael@DanningGill.com
AARON E. DE LEEST (State Bar No. 216832)
adeleest@DanningGill.com
SHANTAL MALMED (State Bar No. 351496)
smalmed@DanningGill.com
DANNING, GILL, ISRAEL & KRASNOFF, LLP
1901 Avenue of the Stars, Suite 450
Los Angeles, California 90067-6006
Telephone: (310) 277-0077
Facsimile: (310) 277-5735

Attorneys for Plaintiff Jeffrey I. Golden,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
JAMIE LYNN GALLIAN,
Debtor.

Case No. 8:21-bk-11710-SC
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee,
Plaintiff,
vs.
J-SANDCASTLE CO., LLC; J-PAD LLC;
STEVEN D. GALLIAN; BRIAN J.
GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
AND E.J. GALLIAN,
Defendants.

Adv. No. 8:23-ap-01064-SC
**[PROPOSED] DEFAULT JUDGMENT
AGAINST J-PAD LLC**

Date: May 7, 2024
Time: 1:30 p.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, California 92701

On May 7, 2024, the Court heard and considered the Plaintiff's Motion for Default Judgment under LBR 7055-1 against Defendant J-Pad LLC (the "Motion") filed by Plaintiff Jeffrey I. Golden, as the Chapter 7 Trustee (the "Trustee" or "Plaintiff") for the bankruptcy estate of Jamie Lynn Gallian (the "Debtor").

The Court having read and considered the Motion, having found that notice of the Motion was adequate and proper, having noted the lack of any response and that the Clerk of the Court entered the default of Defendant J-Pad LLC (“Defendant”) on August 22, 2023, and good cause appearing:

IT IS ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is granted.
2. Default judgment is entered in favor of the Plaintiff and against the Defendant on the Plaintiff’s first and fifth claims for relief in the Complaint.
3. The transfer to the Defendant of a lien on and security interest in the manufactured home located at 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA, AC7V710394GB (the “Property”) reflected by the note and security agreement between J-Sandcastle Co., LLC and the Defendant dated November 16, 2018 and any liens on the Property in favor of the Defendant, are avoided and preserved for the benefit of the Debtor’s estate.
4. The transfers to the Defendant, including the following UCC Financing Statements (UCC-1) and UCC Financing Statement Amendments (UCC-3) and any liens on the Property in favor of the Defendant, are avoided and preserved for the benefit of the Debtor’s estate.

UCC Filing Date	UCC Type	Filing No.
1/14/2019	UCC-1 Financing Statement	197691916827
1/14/2019	UCC-1 Financing Statement	197691915674
1/14/2019	UCC-1 Financing Statement	197691905279
12/4/2020	UCC-3 Amendment	U200034803831
9/8/2021	UCC-3 Amendment	U210083394336
9/8/2021	UCC-3 Amendment	U210083400018
9/12/2021	UCC-3 Amendment	U210084251426
9/12/2021	UCC-3 Amendment	U210084255728
9/12/2021	UCC-3 Amendment	U210084256326
9/24/2021	UCC-3 Amendment	U210088103629

1 5. The Debtor's transfers to the Defendant reflected by the "Statement of Facts"
2 submitted to the California Department of Housing and Community Development on or about
3 August 6, 2021, stating that the legal owner of the Property was the Defendant and that the
4 Defendant perfected its lien on January 14, 2019, and the "Statement to Encumber" purportedly
5 signed on January 14, 2019, reflecting that the "legal owner" of the Property was the Defendant
6 and any liens on the Property in favor of the Defendant, are avoided and preserved for the benefit
7 of the Debtor's estate.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1 (J-PAD LLC) will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) April 5, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) April 5, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson
U.S. Bankruptcy Court
Ronald Reagan Federal Building
411 W. Fourth Street, Suite 5130
Santa Ana, CA 92701

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 5, 2024

Date

Gloria Ramos

Printed Name

/s/ Gloria Ramos

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

- **Bradford Barnhardt** bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- **Aaron E. DE Leest** adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **Jeffrey I Golden (TR)** lwerner@go2.law, jig@trustesolutions.net; kadele@go2.law; C205@ecfcbis.com
- **D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **Eric P Israel** eisrael@danninggill.com, danninggill@gmail.com; eisrael@ecf.inforuptcy.com
- **Shantal Malmed** smalmed@danninggill.com
- **Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

J-Pad LLC
Jamie Lynn Gallian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

Office of the U.S. Trustee
411 West Fourth Street, Suite 7160
Santa Ana, CA 92701-4593